

Carl D. Petersen
I009 Individual Letter

- Comment 1** The attachments are my letters to you regarding those now infamous Tasks 5A & 5B; my letter to Ms Catherine Lang, Acting Associate Administrator for Airports, US Dept. of Transportation, Federal Aviation Administration, Washington D.C; three (3) letters I wrote to my Congressional Delegation, Senators Bill Nelson and Mel Martinez and Representative Allen Boyd; the St Joe letter to the Chairman Airport Board closing the deal in West Bay with attachments. I wish to have them made a part of the permanent record.
- Response** The comments in the referenced attachments are responded to herein and are a part of the FAA's record for the project. Regarding the attachment dated June 6 to Ms. Virginia Lane, the responses to that letter follow. Regarding the attachment dated June 14, 2006 to Catherine Lang, this was treated as a separate comment letter, and the responses are provided in comment letter identified as I001. Regarding the attachments to Senators Bill Nelson and Mel Martinez and Representative Allen Boyd, the responses to those letters follow. No responses to the 1999 letter from St. Joe or the 2002 letter from Brigadier General New are appropriate as they were not provided on the FEIS.
- Comment 2** With the above in mind I would hope that the FAA doesn't treat my comments as if I fell off the turnip truck. Now for added comments:
- Response** The FAA has considered all of the Commentor's letters received after May 19, 2006 in the ROD.
- Comment 3** Close proximity is never defined. With only one near miss in 2005 and 2004, it appears that safety is paramount in the eyes of the military pilots because close proximity has been avoided except on two occasions in 730 consecutive days.
- Response** This comment consists of a statement of opinion to which FAA can not provide a meaningful response. Brigadier General New's comments were considered as input to the EIS process but were not the basis for FAA's development of purpose and need or decisions.
- Comment 4** Do your aviation demand forecasts that reflect current and anticipated airline industry trends include a change in the aircraft fleet and load factors for PFN to include large frame aircraft, B747 and B777 type aircraft for PFN, and the accompanying load factors.
- Response** The FAA's TAF, which was used for FEIS analysis, provides forecasts of operations and enplanements and does not include fleet mix or load factors. The fleet mix and load factors were developed for the EIS analysis and include such aircraft as shown on Figure 2-4. No B747 and B777 aircraft were included in the FEIS fleet mix. B767 aircraft are included in the fleet mix in the Airport Sponsor's forecast. See Appendix K, Volume II of the FEIS for the FEIS fleet mix and Comment 1-5-64 – 1-5-123 in Volume IV (Letter I107) for the fleet mix for the Airport Sponsor's forecast.
- Comment 5** Why doesn't the FAA prove there is a "near miss" scenario when Atlanta has a peak hour of 245 per hour and 2500 operations per day using five runways. As said in my response, attached, the FAA is either reckless at ATL or fleckless [sic] at PFN.
- Response** This is not a substantive comment regarding the analysis of the FEIS. Comparisons of operations or procedures at particular airports or within particular airspace environments are often meaningless, because of the varying conditions at the specific locations. The number of operations at any given airport or how the airspace is operated at other airports is not relevant to the comparison of alternatives in this EIS.

Carl D. Petersen
I009 Individual Letter

- Comment 6** Further, the FAA should run a comparative analysis of the F22 units located at Langley AFB [sic] VA and Nellis AFB [sic] NV both of which are in high density commercial and GA operating areas; and also look at Eglin AFB [sic] FL, a joint use base with a private airport 4 miles to the south and two military auxiliary airfields within the airport boundaries to see how it is done.
- Response** The comparisons requested in this comment are not an appropriate comparison for the discussion of PFN. The FAA appropriately coordinated with Tyndall and Eglin AFB personnel during the EIS process to discuss any potential airspace conflicts.
- Comment 7** **Major Gen [sic] Jack Eggington Letter, 5 January 2005.** Gen. Eggington's letter stresses retaining and using the existing airspace; and, its importance to the training mission. He does not reiterate the F22 problem and the need to "deconflict" military from civil aircraft nor [sic] seem to be worried about "large frame aircraft." [sic] overcrowding the skies from the increase in air carriers alleged to be in the PFN forecast. His comments seem to me to bring common sense to the table and should be the basis for the PFN –Tyndall AFB operational relationship[sic]
- Response** General Eggington's comments were provided in response to the DEIS and in FAA's opinion support the need to ensure that any alternative that the FAA may select as its preferred alternative does not in any way further complicate the complexity of the airspace or to hinder the ability of Tyndall AFB to further its mission.
- Comment 8** To date some \$33 million has been spent on this project and another \$45 million has been funded by the State of Florida and we've [sic] haven't received an approval on a Record of Decision from the FAA. I'm sure it's not the FAA's fault that this has occurred at the PFN level. I' [sic] convinced that the State of Florida[sic] who established the Airport Authority by PL 1677, a third revision from the charter approved in the late 1960s and the Bay County and Panama City Commissions have let the. [sic] Airport Authority run on too long without some outside oversight of their activities.
- Response** This is not a substantive comment on the FEIS and is outside the scope of the FEIS. The remainder of this comment consists of statements of opinion for which the FAA cannot provide a meaningful response.
- Comment 9** **Environmental Issue.** I am aware of the 13 environmental group's joint letter to the FAA and COE concerning the need for as [sic] Programmatic Environmental Impact Statement (PEIS); or, at least, a Supplemental Environmental Statement (SEIS).
- Response** Please see the Responses to Comments 2 and 3 in Letter P001 of Appendix B of this ROD.
- Comment 10** The St Andrew Bay is being assaulted from the West Bay and now from the current airport if it is to be disposed of. The St Andrew Bay's 1144 square miles contains some 350 plant species, 1782 invertebrates [sic] species and 398 vertebrates for a total of 2520 species. Does St Andrew Bay deserve to be destroyed as [sic] for the sake of expediency? At the minimum a Supplemental Environmental Impact Statement should be accomplished. The biodiversity of the bay needs to be preserved and nurtured not savaged by green and a reckless disregard for the plants and creatures whose survival depends on it.

Carl D. Petersen
I009 Individual Letter

Response The FAA does not believe that preparation of a Supplemental EIS is required because all impacts that would result from implementation of the project are disclosed in the FEIS, based on best available information. The FAA does not believe that any new information was developed that would meet the CEQ standard for the development of a Supplemental EIS or affect the FAA's choice among alternatives considered in the EIS. The remainder of this comment consists of statements of opinion for which the FAA cannot provide a meaningful response.

Comment 11 **“Comment Noted”** This leaves the writer hung out to dry. Does it mean noted and agree [sic] or disagree [sic]? Can the writer assume the respondent agreed? Disagreed? Are the facts provided by the author accepted by the FAA responder.

Response The Commentor expresses dissatisfaction with FAA responses that consisted of “Comment noted”. This response was provided in those instances where the Commentor expressed personal opinion or otherwise offered information to which the FAA could not provide a substantive response. The FAA's response of “Comment noted” indicates that the FAA has read and considered the comment.

Comment 12 At least you could have included a reference and a web site where the current FAA forecasts could be found, the date of the last forecast and what the trend was from the last report.

Response The 2005 TAF data for PFN is included in Tables 1-5 and 1-6 and Section 1.7.2 of the FEIS and also available on the FAA website:
http://www.faa.gov/data_statistics/aviation/taf_reports/

Comment 13 In one instance the FAA included the Airport Sponsor's forecasts to show potential range of effects. One sponsor's forecast showed as many as 1,500,000 passengers more than the FAA TAF from 2010 to 2020; and another Sponsor study forecasts of 500 B767 operations operating out of the Sponsor's new airport by 2018. It leaves on [sic] to wonder if the FAA is serious about a realistic potential range; or, buying in to the Sponsors [sic] dream.

Response The FAA did not rely on forecasts in the *Feasibility Study*. The FAA used the 2004 Airport Sponsor's forecast in the FEIS to assess the full range of potential environmental impacts, but has relied upon the TAF in reaching a decision regarding approval of the Airport Sponsor's proposed project. The 2004 Airport Sponsor's forecast included 500 annual operations of B767 aircraft in 2018.

Comment 14 **Military Terminology** Here again the failure to identify military personnel by their appropriate rank and organization to which assigned was inappropriate and could have lead [led] many readers to believe that the participants in joint civil-military activities were in positions of greater responsibility than their actual duty assignment. The an [sic] acronym, DOD, as used in the FEIS involving personnel at positions and a command six times removed from the DOD is a stretch.

Response This is not a substantive comment on the FEIS. Tyndall AFB and Eglin AFB leadership identified appropriate staff to coordinate with the FAA for the EIS process.

Comment 15 In closing, I would like to comment on the problem of accountability and management. In my mind there has been very little. This project been in the system for six years and with \$33 million spent and another \$45 million more to follow thanks to the Florida legislature and whatever the FAA is going to donate to the cause. We have yet to get to a Record of Decision and may not for quite sometime with some 13 environmentally oriented organizations insisting on, as a minimum, a Supplement EIS to cover the sale and proposed use of the current PFN and other areas once the new facility is completed [sic] can lead one to believe along the way both federal and state oversight of this project has been nearly sorely missing; and, accountability has taken a back seat to expediency.

Response This comment is a statement of opinion and is not a substantive comment on the FEIS. The FAA is therefore unable to provide a meaningful response.

Comment 16 Finally, what aviation forecast do you have that reviews enplanements and potential markets, the size of potential aircrafts you expect to serve our market considering, at this time a lack of documented commitment by any airline for the FAA to agree [sic] relocate PFN airport.

Response The FAA's TAF, which was used for FEIS analysis, provides forecasts of operations and enplanements and does not include fleet mix or load factors. The Airport Sponsor's forecast was also used in the FEIS, as referenced in Section 1.7.2 of the FEIS. The fleet mix and load factors were developed for the EIS analysis and include such aircraft as shown on Figure 2-4, based on the Airport Sponsor's forecast. See Appendix K, Volume II of the FEIS.

Comment 17 Will the FAA be a willing accomplice in the ecological destruction of St Andrew Bay that will follow to one of the most bio diverse estuaries in the United States? Is it an operational decision or a political decision to help avarice developers?

Response This is not a substantive comment on the FEIS. The FAA is therefore unable to provide a meaningful response.

Comment 18 Background: "FAA has requested additional work scope described in Tasks 5A and 5B in order to complete the EIS process ***** "FAA is providing a grant that will fund 95% of the cost of the additional work" **No mention that the work on Task 5A had been initiated in the spring of 2005nor Task 5B in the fall.**

Response The timing of the Sponsor's procurement process is irrelevant to the FAA's objective analysis of the work products ultimately produced by the FAA's prime consultant. The FAA developed the schedule of the EIS independent of the Sponsor's local procurement process and the timing of that process. Therefore, the timing of the funding for the professional services rendered by the consultants had no impact on the timing and objectivity of the FAA's phased analysis of the Airport Sponsor's proposed project.

Comment 19 Discussion "In Task 9 of Scope of Scope of Services ***** identified potential additional tasks that might be required to complete the EIS process" ***** "In order to respond to comments received on the Draft EIS, and to prepare and produce the Final EIS, the FAA has directed that additional tasks be completed. These additional tasks make up Phase 5B." **No mention was made that Task 5B was initiated in the fall of 2005[sic]**

Response Please see the Response to Comment 18 above.

Carl D. Petersen
I009 Individual Letter

Comment 20 “In November 2005, the FAA determined that the information in the Request for Proposals to Purchase the Existing Airport and the Background Analysis and Master Planning report for Redevelopment ***** need to be included in the Final EIS. **Again, no mention that Phase 5B was initiated in the fall of 2005.**

Response Please see the Response to Comment 18 above.

Comment 21 Comment. My impression, when I listened to the 28March 2006 Board discussions regarding the start of Tasks 5A & 5B that came about after November 2005 Draft EIS comments were received by the FAA, was that it was not so much enhancing the FEIS as it was the AIP grant that the Airport Authority was accepting because it has a positive impact on their FY2006 budget. This appeared to me to be more important than the “added” Task’s 5A & 5B to enhance the Final EIS.

Response This is not a substantive comment on the FEIS and the FAA is not able to provide a meaningful response.

Comment 22 Discussion: “The Board has previously approved a Master Contract Agreement and various Task Orders with Kimley-Horn ***** FAA has directed that additional analysis be done before the issuance of the Final EIS. This item provides for Phase 5A and 5B of the work to be performed.” **No mention here that the work was already accomplished before 28March 2006’s approval.**

Response Please see the Response to Comment 21 above.

Comment 23 The additional tasks in Phase 5A included 17 tasks to complete the requirement at the new site and 22tasks [sic] to be completed at the existing site with the words “additional tasks” used to identify each phase and a cost figure for each. Additionally, the Board is advised that “time is of the essence” to give the Board Chairman or his designee approval “to issue a Notice to Proceed” once grant funds have been obtained. Further, under “Action Required,” management asks the board to issue a “Notice to Proceed for Phases 5A and 5B, contingent on receiving grant funding and Notice to Proceed from FAA and FDOT” and “execute the necessary documents with Kimley-Horn to do the work”

Comment: Does this type document with comments as cited above lead anyone in the public domain to believe the work had already been accomplished or initiated as noted by you. in [sic]response to our e-mail dialogue commencing on 7 May 2006 about Phase 5A and 5B?

Response Please see the Response to Comment 21 above.

Comment 24 I am requesting, not that you read the package and comment on it, but that you insure [sic] he FAA responds to my letter with written comments devoid of such words as “noted” or words and statements that are what I call glittering generalities and/or emotional appeal.

Response See below for responses to comments contained in this letter. In responding to comments on the FEIS, the FAA has provided specific responses to substantive comments.

Carl D. Petersen
I009 Individual Letter

Comment 25 Since 911 there has been a major change in commercial aviation industry and its back wash at Panama City – Bay County International Airport. Such things as an unfounded traffic conflict between military and commercial aircraft; the drawdown of commercial airlines servicing our airport by 52%; rising construction and operating costs, fewer passenger boarding's [sic]; the expenditure of funds exceeding \$33 million to date with an additional Florida budget allocation of \$45 million; and, last but not least the potential environmental destruction of St Andrew Bay that's biodiversity exceeds that of the Indian River Lagoon, currently in the US National Estuary Program.

Response FAA recognizes that the aviation industry experiences fluctuations in activity. Such fluctuations do not necessarily reflect long-term trends in the aviation industry in general or in any particular market. Long-term trends have historically and will continue to reflect long term growth. FAA acknowledges that there was a downturn in the aviation industry immediately following the attacks of 9/11. However, generally the aviation industry has rebounded nationally and at PFN. As airlines exit and enter markets there will be short-term fluctuations in airport operations in a given market. The size of the aircraft and frequency of operations and market destinations are business-based decisions made by individual airlines and the FAA plays no role in those decisions.

The FAA is charged with implementation of federal policies under its statutory authority. It is within this statutory authority that the FAA is responding to the Airport Sponsor's proposal to relocate the existing airport. The Airport Sponsor has indicated that they intend to build the proposed project, which includes an 8,400 foot runway.

The remainder of this comment is not a substantive comment on the FEIS and the FAA is not able to provide a meaningful response.

Comment 26 It seems to me that the other side of the issue – no airport relocation or move at this time – needs to be heard. I don't know about anyone else, but I seem to have struck out with you on this issue which, in my opinion should be of major concern for you. On your last visit here, the local Republican power brokers kept you away from those of us who disagree with the proponents of the relocation which serves to conform [sic] that it's a land deal not an airport deal. Are you "fair and balanced?"

Response The FAA has considered all viewpoints on the proposed relocation of the Panama City-Bay County International Airport as evidenced throughout the EIS process, as documented in the DEIS, FEIS, and this ROD. The remainder of this comment is the Commentor's opinion to which the FAA is unable to provide a meaningful response.

Comment 27 I am requesting, not that you read the package and comment on it, but that you insure that the FAA responds to my letter with written comments devoid of such words as "noted" or words and statements that are what I call glittering generalities and/or emotional appeal.

Response Please see the Response to Comment 24 above.

Carl D. Petersen
I009 Individual Letter

Comment 28 Since 911 there has been a major change in commercial aviation industry and its back wash at Panama City – Bay County International Airport. Such things as an unfounded traffic conflict between military and commercial aircraft; the drawdown of commercial airlines servicing our airport by 52%; rising construction and operating costs, fewer passenger boarding’s [sic]; the expenditure of funds exceeding \$33 million to date with an additional Florida budget allocation of \$45 million; and, last but not least the potential environmental destruction of St Andrew Bay that’s biodiversity exceeds that of the Indian River Lagoon, currently in the US National Estuary Program.

Response Please see the Response to Comment 25 above.

Comment 29 It seems to me that the other side of the issue – no airport relocation or move at this time – needs to be heard. I don’t know about anyone else, but I seem to have struck out with you on this issue which, in my opinion should be of major concern for you. While you may disagree with our stand on this issue, the failure to hear our side of the story serves to conform [sic] that it’s a land deal not an airport deal. Are you “fair and balanced?”

Response Please see the Response to Comment 26 above.

Comment 30 I am requesting, not that you read the package and comment on it, but that you insure that the FAA responds to my letter with written comments devoid of such words as “noted” or words and statements that are what I call glittering generalities and/or emotional appeal.

Response Please see the Response to Comment 24 above.

Comment 31 Since 911 there has been a major change in commercial aviation industry and its back wash at Panama City – Bay County International Airport. Such things as an unfounded traffic conflict between military and commercial aircraft; the drawdown of commercial airlines servicing our airport by 52%; rising construction and operating costs, fewer passenger boarding’s [sic]; the expenditure of funds exceeding \$33 million to date with an additional Florida budget allocation of \$45 million; and, last but not least the potential environmental destruction of St Andrew Bay that’s [sic] biodiversity exceeds that of the Indian River Lagoon, currently in the US National Estuary Program.

Response Please see the Response to Comment 25 above.

Comment 32 It seems to me that the other side of the issue – no airport relocation or move at this time – needs to be heard. I don’t know about anyone else, but I seem to have struck out with you on this issue which, in my opinion should be of major concern for you. While we may disagree with your stand on this issue, the failure to hear our side of the story serves to conform [sic] that it’s a land deal not an airport deal. Are you “fair and balanced?”

Response Please see the Response to Comment 26 above.

Comment 33 (1-5-1) Peterson Response to Your Response: Your response contains the usual glittering generalities and cracker barrel philosophy. It's [been] nearly 5 years since 9/11. What evidence can you provide to prove your thesis that the TAF remains valid. What overall trends are you referring to that leads you to believe all will be well and a booming aviation market will greet PFN's new airport by 2010/2011? I don't believe the Airlines \$35 billion in losses since 9/11, withdrawal of 722 aircraft from service be seven legacy airlines and the layoff of 88,000 employees including 10,000 pilots and 12 or more airline bankruptcies including liquidations doesn't, after 5 years, appear to me be "short-term occurrences" as you the FAA puts it. What evidence does the FAA have to classify the above as "short term occurrences?"

Response Please see the Response to Comment 25 above. The FAA has used both the FAA's TAF and the Airport Sponsor's forecast to analyze a full range of potential environmental impacts in the EIS. Aviation demand forecasts are developed to represent trends in aviation activity—passenger and cargo enplanements and aircraft operations—for planning purposes. Activity during a particular year may be above or below the forecast activity, based on specific short-term occurrences, such as the loss of service by a particular carrier. It should be noted that enplanements at PFN in 2003 exceeded pre-9/11 activity and have continued to increase with some year-to-year fluctuations.

Comment 34 (5-5-2) Peterson Response to Your Response: Just what does "comment noted" mean? The PFN Airport Authority has gone through \$33 million to date and have another \$45 million in their war chest. That brings the total available cash spent and to spend to \$77 million. The PFN total of this amount is about \$394,000. Is this another short term occurrence? They do real well spending other people's money and have yet to get approval for this project.

Response Please see the Response to Comment 11 above. The remainder of this comment consists of statements of opinion for which the FAA cannot provide a meaningful response.

Comment 35 (2-5-3) Peterson Response to Your Response: I realize both runway lengths are analyzed in the study. The question is will there be a full build out to 8400 ft or will the FAA go with funding 6800 ft with PFN looking at the State of Florida for funding the added 1600 ft of runway? When will a final decision be made?

Response The Airport Sponsor has indicated that they intend to build the proposed project, which includes an 8,400 foot runway. The FAA decision on the level of funding will not be determined until after the ROD is issued. The ROD is the decision on the EIS, and the FAA decision on funding is a separate process. However, the FAA has advised the sponsor that, at this time, the costs of constructing only 6,800 feet out of the total 8,400 feet of the primary runway are eligible for AIP funding. This is consistent with facility needs identified using the FAA TAF and FAA's independent runway length analysis. The FAA is not in a position to comment on the State of Florida's participation in funding of the project.

Comment 36 (5-5-4) Peterson Response to Your Response: Does the FAA have a list of acceptable professional specialists. How do we Florida taxpayers know if the "professional" chosen is qualified, eminently qualified, or an also ran *Independent!!!* The fiasco over the handling of the Task 5A & 5B proposal regarding when the work was done, when the proposal was submitted and subsequently funded should be of concern to all. Who has misinformed the public on this proposal and what is going to be done about it?

Carl D. Petersen
I009 Individual Letter

- Response** The FAA selects its consultants for EIS preparation consistent with the guidance provided in FAA Order 5050.4B and Advisory Circular 150/5100-14. The FAA independently reviews the qualifications of all potential consultants before making its selection for a particular consultant to assist the FAA in preparing the EIS.
- Comment 37** (1-5-5) Peterson Response to Your Response: Your response avoids the issue. In your FAA letter dated 19 August 2000 to the PFN Airport Director, in your attachment you specifically asked; “One of the study’s assumptions is that Southwest will serve Panama City-Bay County International Airport (PFN) by 2010. Please explain the basis of this assumption.” My question and yours went unanswered. To me that is slipshod staff work. The question is still valid and such a vision in this day and under the current commercial aviation environment is, in my opinion, a dream gone wild. Why did your staff fail to get a response?
- Response** The forecasts in the *Feasibility Study* from 2000, which the FAA assumes to be the document containing the reference to Southwest Airlines, were not accepted by the FAA for use in EIS. The 2004 forecasts prepared by the Airport Sponsor do not include the anticipation that Southwest Airlines will serve PFN in the near future. Therefore, the referenced letter predates the EIS process and is not relevant to the EIS analysis.
- Comment 38** (5-5-6) Peterson Response to Your Response: This question was raised in the same FAA letter cited above. You directed the question to the sponsor; “Another assumption is that PFN would attract a larger share of traffic from beyond the Southeast United States. Please elaborate.” I assume from your response to my question, it went unanswered and then Acting Manager, John W. Reynolds, was stiffed by PFN’s Mr. Curtis to whom the letter was addressed.
- Response** The assumption that PFN would attract a larger share of traffic from beyond the Southeast US was not used as a basis for development of purpose and need in the EIS. The remainder of the comment is the Commentor’s opinion and the comment is not relevant to the EIS analysis.
- Comment 39** (1-5-7) Peterson Response to Your Response: Those are all good buzz words for the public but not for this writer. The Feasibility Study and its forecasts were invalidated by 911 and I have been unable to locate a forecast since then that reflects the steep drop in commercial airline aircraft availability- Here it is a drop of 52%, the loss of two major destinations, and a not too competitive airfare structure. When is the last time the FAA reviewed enplanements, the potential market for PFN, and potential size of aircraft? I used to fly out of PFN in DC-9s and B727s. Now its RJs when I fly. Of the total number of airline operations in May 2006, air taxis accounted for 991 of the 1313 operations. This is 75% of airline operations.
- Response** The FAA has reviewed enplanements throughout the EIS process, defined a market area for PFN (see Section 1.6 of FEIS) and the potential aircraft type (see Section 2.5.2 of FEIS). Please see the Responses to Comments 25 and 33 above. The remainder of the comment provides factual statements on recent aviation activity at PFN, to which the FAA can not provide a meaningful response.
- Comment 40** (1-5-7) How then does the PFN anticipated demand reach the equivalent of the pre 911 25 commercial airline flights per day without regard to specific airlines and type commercial aircraft assuming current load factors ?

Carl D. Petersen
I009 Individual Letter

- Response** The FAA is not required to consider specific airlines in aviation forecasts. The identification of specific airlines has no bearing on analyzing or determining aviation activity or demand. The FAA forecasts are based on a number of factors, including flight destinations, type of service, and aviation markets.
- Comment 41** (5-1-8 and 5-1-9) Peterson Response to 5-1-8 and 5-1-9: I attended the meeting, the public hearing and gave a presentation. Specifically, I'm referring to trying to stop me from talking to the consultants present.
- Response** This is not a comment on the FEIS or any aspect of the analysis. The FAA did follow the appropriate process for public disclosure of information relevant to the EIS and to the FAA's decision.
- Comment 42** (1-5-10) Peterson Response to Your Response: The point is your office obviously doesn't delegate staff work in order to respond to public requests for information, studies, etc. "It is FAA's understanding that the updated forecast has been made available" [sic] That doesn't speak well for FAA staff work. If you know, you should have directed the individual to the agency and a point of contact since, in my case, I did not and still do not know the peculiarities of the FAA administrative system [sic]
- Response** This is not a comment on the FEIS or the adequacy of its analysis, and FAA can not provide a meaningful response. The 2004 forecasts were and are available at the Airport Sponsor's office for public review.
- Comment 43** (3-1-11) The Sponsor failed to consider or ask the Department of the Air Force for joint use that could be similar to Eglin AFB (a two airport operation) which is the home of the Okaloosa Regional Airport, two satellite fields and a private airport 4 miles south of Eglin AFB and home to a F-15 Fighter Wing and selected for the A35 Strike Fighter program in the future. Talk about busy, Eglin has a corner on the market while Tyndall languishes in a five day work week. The key is no one considered a split operation and subsequently no one asked the Air Force for consideration of such a concept.
- Response** As noted in Section 3.4.4.1, a joint use alternative does not respond to the FAA's purpose and need which includes the ability to meet FAA safety and design standards, provide for aviation demand within the defined market area, and be compatible with current airspace configuration and utilization. The Air Force was asked to provide additional input and comment on the concept of joint use of Tyndall in an October 7, 2003 letter to BG New. The FAA received no response to this letter.

Carl D. Petersen
I009 Individual Letter

Comment 44 (3-1-11) As Peter Rummell, Chairmen [sic] & CEO of St Joe company so aptly put it in a letter to Mr. Donald Crisp, Chairman: Panama City-Bay County Airport and Industrial District on 17 November 1999.

“First, let me commend you and your [sic] Board for your vision and leadership. The St Joe Company strongly supports to enhance the air service in Northwest Florida”

“The bridge to our bright future is dependent, in so many ways, on the development of a truly regional commercial and industrial service airport.”

“It is becoming more and more clear that a replacement airport is a necessity. Doing nothing is not an option”.

“Therefore, we intend to support this effort appropriately and look forward to working with you to define a successful strategy that will become a source of pride for all of Bay County and Northwest Florida.”

“While we understand that the location of the site has not been determine[sic] our propose[sic] action is contingent upon the site being located in West Bay County generally in the 12 mile area along County Road 388 between St Route 79 and St Route 77

So!! Don’t tell me that anything but relocation was an option in light of these two gentleman’s [sic] alliance. Has the FAA been snookered or did you know about this all the time?

Response This comment was made as a follow-up to comment 3-1-11 stating that the FAA did not make an official inquiry to the USAF to determine if joint use of Tyndall AFB would be acceptable. The FAA did consider a joint use alternative, as referenced in Sections 3.2.5 and 3.4.4.1 of the FEIS. See also the October 7, 2003 letter to Brigadier General New in Appendix D, Volume II of the FEIS.

Comment 45 (1-5-12) Peterson Response to Your Response: What is the source of your aviation forecasts; and, what are their forecasts that shows a turn around in the commercial airline business to the extent that the FAA & the State of Florida should spend \$300 to \$400 million to move the current PFN operation because of its alleged inadequacies. Your response is one for all occasions and provides no definitive documented forecasts to support the relocation. I call it poor staff work. Give us some specifics with supporting rationale NOT BUZZWORDS

Response As noted in Section 1.7.2 of the FEIS, FAA considered the TAF and the Airport Sponsor’s 2004 forecast in the development of purpose and need which included a determination of aviation market demand. The FAA updates the TAF on an annual basis and includes consideration of various factors in each forecast, including recent operational activity, and specific local and regional considerations such as the economy. Please see the Response to Comment 13 above. Regarding FAA’s participation in funding the relocation of PFN, the FAA has advised the sponsor that, at this time, the costs of constructing only 6,800 feet out of the total 8,400 feet of the primary runway are eligible for AIP funding. This is consistent with facility needs identified using the FAA TAF and an independent runway length analysis.

Comment 46 (2-1-13) Peterson Response to Your Response: I have been told that the aforementioned Restricted Airspace is a corridor for high speed low level combat crew training and that radar coverage is unreliable in that area below 1500 ft. TYN is scheduled to get a digital radar and when installed it is their intention to tie into several smaller digital radars to improve cover. I do not believe it has been discussed but the Eglin restricted areas adjacent to the proposed relocation site used for bombing, missile impact areas, and fighter aircrews combat training. Has a flying safety evaluation been completed covering the various situations that could lead to accidents as a result of civilian aircraft straying into USAF restricted areas adjacent to the proposed relocation site? Who is supposed to be the OPR on this issue? Do you have any official military correspondence from appropriate Eglin AFB military command authorities concurring or nonconcurring in the relocation site vis a vis their ranges?

Response The FAA has appropriately coordinated with Tyndall and Eglin AFB personnel regarding airspace issues during the EIS process. In the event the airport is relocated, the FAA will continue the coordination regarding airspace issues. The FAA has no official military correspondence from Eglin AFB staff regarding the relocation site. However, the June 13, 2003 meeting summary in Appendix B, Volume II of the FEIS provides documentation of Eglin AFB participation in EIS coordination efforts, including consideration of the West Bay site. The FAA conducted the appropriate coordination with FAA's military representatives as well as military representatives from Tyndall and Eglin. A definition of the Office of Primary Responsibility (OPR) is outside the scope of the FEIS.

Comment 47 (1-2-14) Peterson Response to Your Response: The Cargo business other than UPS, FEDEX and other night haulers is miniscule and has no impact on the economy anywhere near equivalent to our seaport[sic]

Response The FAA acknowledges the comment.

Comment 48 (1-3-15) Peterson Response to Your Response. My contact is 325OSS/DOAS. Since the meetings were held three years ago, June 12 2003, one would think the FAA knows by now if the Airport Sponsor will have to provide The NAVAIDS discussed above. Nothing like waiting for a Record of Decision to determine a NAVAID is required or not required. What would be the approximate cost? I do not believe it is in the current airport relocation cost plan and who pays for it? Does the FAA require radar calibration analysis of the optional sites selected for PFN's relocation? Were any accomplished by the 325th FW to establish a credible flying safety operational environment?

Response The list of NAVAIDS is included in Appendix E, Volume II of the FEIS, thus the FAA has not delayed the consideration of the relocation of NAVAIDS until the ROD is issued as the Commentor suggests. The costs for the NAVAIDS and air traffic control tower have been included in the Airport Sponsor's estimate of cost for a relocated airport. FAA would participate in funding of NAVAIDS for a relocated airport. Appropriate coordination regarding the relocation of NAVAIDS, including siting of the NAVAIDS, will continue as the process moves forward.

Comment 49 (1-5-17) Peterson Response to Your Response: I guess with "Comment Noted" that neither of the two other airports cited above have any airspace problems, particularly Pensacola, or you would have inserted an appropriate response. I guess the same goes for Eglin AFB as well. The only one crying in their [sic] beer is the Sponsor who those [sic] 12 commercial flights per day are a dangerous threat to Tyndall AFB operational units.

Carl D. Petersen
I009 Individual Letter

Response The EIS No-Action alternative determined that the existing airport is compatible with current airspace configuration. See Section 3.4.1.1 of the FEIS.

Comment 50 (1-5-18) Peterson Response to Your Response: I agree that the FAA forecast is a far better tool than one provided by the Sponsor known to us “po folks” such as the Fishkind Report. It bore no resemblance to the real world of commercial aviation past, present or future.

Response The Airport Sponsor’s forecast was prepared by HNTB Corporation, and not by Fishkind Associates. Regarding the last sentence, this is the Commentor’s opinion for which the FAA cannot provide a meaningful response.

Comment 51 (1-5-19) Peterson Response to Your Response: PFN suffered its first major losses in January 2005 with the withdrawal of USAIR and the loss of Tampa and Dallas Fort Worth as major destinations.. [sic] While airline operations in 2006 are up 10.99%, enplanements are down 8.96% and deplanements are down 9.25% for an overall average of -9.11%. What concerns me is the forecast in the Feasibility Study hasn’t been met and was used as the basis for the relocation in the first place. Shouldn’t the Sponsor be required to amend their Feasibility Study forecast or is [sic] considered history? Maybe they shouldn’t, [sic] There is an Old [old] Air Force saying, “Figures don’t lie but liars figure.” That’s been the Sponsors [sic] concept.

Response The EIS did not rely on the forecast in the Feasibility Report, but did analyze the FAA’s TAF and the 2004 Airport Sponsor’s forecast. The FAA considered the Feasibility Study forecast to be historic/background information.

Comment 52 (1-5-20) Peterson’s Response to Your Response: As my mother in law used to say “Same old sixes and sevens.” A speech for all occasions with no factual data to back it up. Another song and dance.

Response This is the Commentor’s opinion for which the FAA is unable to provide a meaningful response.

Comment 53 (1-5-21) Peterson Response to Your Response: The FAA would have been better off using their TAF and not used the Sponsors at all. Yours is more trustworthy. I agree with Ms[sic] Lane’s decision too [sic] use the FAA TAF.

Response The FAA acknowledges the comment.

Comment 54 (1-5-22) Petersons Response to Your Response: Nothing but buzz words. How does the Sponsor’s erroneous forecasts help the FAA measure “the full range of potential environmental effects” associated with the project? It’s the equivalent of forecasting a hurricane in December. Does this include the manner in which the Sponsor envisions the use of the current airport upon resale? It appears to me to be an environmental nightmare with serious consequences for the St Andrew Bay’s biodiversity.

Response Regarding the second sentence in this comment, FAA does not initiate airport development projects. However, the FAA may consider the Airport Sponsor’s preferences in evaluating airport alternatives. Here the Airport Sponsor has proposed specific development, and the FAA has assessed the environmental impacts of it in conjunction with the Airport Sponsor’s forecast. This along with assessing the impacts of the FAA’s forecasts provides the full range of environmental effects. The remainder of this comment consists of statements of opinion for which the FAA cannot provide a meaningful response.

Carl D. Petersen
I009 Individual Letter

Comment 55 (1-5-23) Peterson Response to Your Response: Give me a break. See my response to 1-5-19. The impact on PFN is going against the grain of “recent trends” as the FAA describes it.

Response Please see the response to Comment 51. The remainder of this comment is the Commentor’s opinion and FAA is unable to provide a meaningful response.

Comment 56 (1-5-24) Peterson Response to Your Response: How can you call a 52% loss of commercial airline flights a short term specific occurrence? When does the Sponsor forecast a return from 12 flights per day to the pre 911 25 flights per day? Current passenger counts are off 9.11% through May 2006. Is that a specific occurrence or a long term trend? Please define the difference of a specific occurrence and along [sic] term trend. The downtrend at PFN began in small numbers but has picked up speed since January 2005.

Response The Airport Sponsor’s 2004 forecasts show that regardless of airport location, the number of passenger “flights” will exceed 25 per day by 2008. The 2005 TAF and the Airport Sponsor’s forecast for a relocated airport show similar trends in increased aviation activity for PFN through 2013. The Commentor is correct that operations at PFN from January to May 2006 are 1% lower compared to the same period in 2005, and enplanements are 9% lower.

Comment 57 (5-5-26) Peterson Response to Your Response: If capacity is not the purpose and need of the proposed project, What is? Certainly if the airport doesn’t have a capacity problem with passenger enplanements / deplanements and is capable of accommodating a B757 (the Vice President of the United States), C130 and C141 as far as airlift capacity and need is concerned then what other purpose and need is there? Please explain.

Response Capacity is not the purpose and need for the proposed project. The purpose and FAA need for the proposed project is defined in Sections 2.5.1 and 2.5.2: to ensure that the airport meets FAA design standards and is operated in a safe and efficient manner, to address aviation demand for the air service area, to address the effects of the airport related to noise and land use compatibility, and to address the need identified by the FAA for adequate runway length to accommodate existing and projected aviation demand. Regarding the last sentence of the comment, the referenced B757 and military aircraft are not representative of regularly scheduled commercial passenger operations because of differing operational requirements of these aircraft.

Comment 58 (5-5-27) Peterson Response to Your Response: Specific airline withdrawals from PFN and loss of major hub destinations have been documented. Specific airline “commitments” to withdraw have been documented. Specific flight cancellations have been documented, at this time, from a year to several years. Some of the Sponsor’s forecasts have been outrageous. Some are more reliable. The current down trend is specific? Which ones, specifically did the FAA use?

Response As mentioned in response to Comment 56, the current trend at PFN shows fewer operations and enplanements. However, the long term trend nationwide as well as at PFN is indicated in the 2005 TAF and shows increased aviation activity. As referenced in Section 1.7.2 of the FEIS, the FAA used the 2003 TAF and the 2004 Airport Sponsor’s forecast in the FEIS.

Comment 59 (1-5-28) Much has been forecast in terms of Aircraft Boardings with more than optimistic pictures of exponential national and international growth in air travel. Number[sic] skyrocket in out years; but the near term is ignored in The [sic] sponsors [sic] forecasts. Where will it come from? Which airlines are potential candidates? What size market will it take to achieve an introduction of one or more airlines whether it be a Legacy airline or a Walmart airline sometimes called a Low Cost Carrier (LCC)

Response See response to comment 5-5-27

Peterson Response to Your Response: See my response to 5-5-27

Response Please see the response to Comment 58 above.

Comment 60 (1-5-29) Currently PFN has ASA, Northwest Airlinck and Chautauqua Airlines with ASA the predominant carrier with 142, 582 enplanements to Atlanta as its destination. Next is Northwest Airlinck with 36,835 enplanements from here to Memphis. Comairs [sic] boardings dropped 54% to 2,846, Skywest is gone as is USAIR with 12,800 enplanements. Only Chautauqua remains with a one daily trip to Orlando. The names dropped from time to time are Southwest, AirTran and Jet Blue airlines. An examination of their operational status might reveal why they are unlikely candidates.

Response Aviation forecasts are prepared based on anticipated demand, and is not airline specific unless specific airline commitments have been documented. The forecasts include a review of enplaned passengers and potential markets, and the size of potential aircrafts that would serve these markets. It is not within the scope of the EIS to predict airline response to demand.

Peterson Response to Your Response: This is a recurring response to my statements. Maybe it would be easier on the concerned public if they knew what constitutes a specific airline commitment. When an airline announces they intend [sic] withdraw from a specified airport, what must it do to satisfy your criteria? What is the FAA's criteria for [sic] developing forecasts. What has your analysis revealed for PFN and when was it done? Is your analysis dynamic and continuous; or, done on a fixed calendar basis?

Comment 60
Con't

Response It is not within the scope of the EIS to predict airline responses to demand, whether by entering or leaving a specific market. The FEIS discloses the most recent TAF data, which is updated and issued on a yearly basis, for the Panama City-Bay County International Airport. Please see Table 1-6 of the FEIS. The TAF is the official forecast of aviation activity prepared by the FAA. These forecasts are used to project the budget and planning needs of the FAA and provide information for use by state and local authorities, the aviation industry, and the public.

Comment 61 (1-5-30) Peterson Response to Your Response: See my response at 1-5-29

Response Please see the response to Comment 60 above.

Comment 62 (1-5-31) Peterson Response to Your Response: See my response to 1-5-29

Response Please see the response to Comment 60 above.

Comment 63 (1-2-32) How the FAA can support the Sponsors alleged clash of military and civil aircraft when they have a commercial airport with a bout [sic] 2600 operations per day with a peak hour of 245 operations per hour including a fifth new runway all

Carl D. Petersen
I009 Individual Letter

within two miles of each other --- I'm referring to Atlanta. I don't know the actual separation in feet between runways but the average if evenly spaced would be 2100 ft. Add in FTK, 10 nm away (346 ops/day), PDK 16 nm away (639 ops/day) and MGE 17 nm away with of all things the F22 production and test flight facility and you have a "real" not an "alleged" complexity and a "potential for conflicts." With PFN averaging one(1) [sic] airline operation every 1.3 hours per 16 hr day confirms what I wrote Ms [sic] Catherine Lane, Acting Associate Administrator For Airports, FAA, Washington DC that one can conclude that the FAA is reckless at Atlanta or fleckless [sic] at PFN. Maybe both.

Response This is not a substantive comment regarding the analysis of the FEIS. Please see the Response to Comment 5 above.

Comment 64 (2-1-33) Peterson Response to Your Response: Check Peterson Response to your Response at 3-1-1 for the St Joe Co influence on the PFN relocation project dating back to 19 November 1999 [sic]

Response Please see the response to Comment 44 above.

Comment 65 (1-3-35) Peterson Response to Your Response: I assume it is not a safety factor or the Sponsor has reckless disregard for safety. Which is it? This situation has existed since PFN was put into operation and now it's a calamity, a flight safety crisis! C141, C130, B757, B727, B737, DC9, type aircraft have flown into/out of PFN for periods covering decades; but, now, after all these years the Sponsor considers it a crisis.

Response This comment consists of the Commentor's characterization of the content of the FEIS and is commentary on his view of airspace considerations and the Airport Sponsor's proposal. As a result, the FAA cannot provide a meaningful response.

Comment 66 (1-3-36) First, Mr. Wintersole was assigned to the 325th Fighter Wing, now retired. He was FOUR commands removed from the Department of Defense and ONE step down the command chain of the 325th FW Headquarters. In essence he was FIVE commands down the line [sic] Since some of the overland restricted airspace and all the over water ranges are controlled by military authorities at Eglin AFB, they should be speaking for themselves; and not by an individual whose level of authority is misrepresented to those that read this report. The implication that PFN must move due to airspace problems is a myth [sic]

Response The FAA has documented the purpose and need for the project in Section 2.5.1 and 2.5.2, Volume I of the FEIS. The FAA believes it has undertaken appropriate coordination with the military as documented in the FEIS and discussed in previous response to Comment 43. The remainder of this comment consists of the Commentor's opinion and the FAA is unable to provide a meaningful response.

Comment 67 (1-3-36) To say the place is now a hazard to general and or commercial aviation is totally and completely untrue; and, to move because of the F22 that has flown here for three years or more leads me to believe this is one crutch to justification that is without merit, in my opinion. Prove me wrong.

Response This comment consists of the Commentor's opinion and the FAA is unable to provide a meaningful response.

Comment 68 (1-3-37) Peterson Response to Your Response: See Peterson response to 1-3-36

Response Please see the response to Comment 68 above.

Carl D. Petersen
I009 Individual Letter

Comment 69 (1-3-38) Peterson Response to Your Response: No one has the courage or guts to go out on a limb on this because of the politics associated with this proposal, the desire to be a “good neighbor” or don’t want to get caught in a contest with a skunk. I have yet to find any comments in the meetings conducted by your contract representatives with Air Force personnel that indicates [sic] near misses, military aircraft “spill outs” from controlled airspace has caused near collisions with either general aviation aircraft or commercial airlines.

Response The FAA has not indicated in the FEIS that there have been “near misses, [or] military aircraft ‘spill outs’ from controlled airspace” that have “caused near collisions with either general aviation aircraft or commercial airlines.” The purpose of the “Compatibility with Airspace Configuration/Utilization” criterion is to ensure that any alternative would not increase the potential for airspace conflicts as a result of the Airport Sponsor’s proposed project. The complexity of airspace is not defined by the existence or lack thereof of “near collisions.”

Comment 70 (1-5-39) Peterson Response to Your Response: Thank You. I reviewed the attendance rosters, one of which has unit affiliation, 25September 2003 meeting. The 28 April 2003 roster was inadequate having only name, telephone number and e-mail address (hardly an accurate reflection of those attending). Of those attending the 25September meeting, their organization falls under the 325th Operations Group who, in turn reports to [sic] 325th Fighter Wing Commander which puts the attendees “pretty far down the pecking order” when it comes to decisions etc. They certainly do not represent DOD nor Hq, USAF. Air Education and Training Command and 19th Air Force all of which have command oversight from the top down.

Response This is the Commentor’s opinion and the FAA is unable to provide a meaningful response. FAA properly coordinated with the military representatives that were made available to FAA for purposes of coordination on this project.

Comment 71 (1-5-40) Peterson Response to Your Response: This paragraph is another flawed forecast with a wish list need. The comment “***there is a potential demand for narrow-body jet aircraft such as the Airbus Industries A320 and the Boeing 737-800 series aircraft in the future” is not documented with factual data to illustrate and confirm this need. This forecast has been overtaken by events. Since 2003 PFN has been reduced to 12 flights per day and lost two major destination hubs, Tampa and Dallas Fort Worth. No evidence is provided to validate such an increase in capability; and, in light of the downturn over the past two years in passenger [sic] hauled and the major passenger carriers being in the air taxi column and not the airline column, where does the Sponsor get off showing the A320 and B737 as aircraft in heir [sic] future? The Sponsor would be happy to get back to 25 flights per day even with air taxi type aircraft let alone an A320 or a B737.

Response The forecast aircraft fleet and the identification of potential markets that could be served non-stop from the airport were developed by the FAA on the basis of enplaned passengers, the number of annual passengers who are destined for specific markets based on historical ticket data, and industry trends in terms of fleet decisions and service patterns. The runway length requirement identified by the FAA were based on those assessments and assumed that no passenger or cargo weight penalties would be required for those markets.

Comment 72 (1-3-41) Has the FAA had any formal requests for added airspace from the USAF because its performance characteristics are so unique that the 35th Fighter Wing’s training mission has been jeopardized? If so, please provide me with a copy of such a request.

Carl D. Petersen
I009 Individual Letter

Response The FAA has not received any communications from the USAF stating that the “35th Fighter Wing’s training mission has been jeopardized” or asking for additional airspace.

Comment 73 (1-3-41) B/G Eggington’s letter is far more to the point and he certainly doesn’t insult one’s intelligence with mythological descriptions of the F22s performance characteristics and general aviations and commercial airlines threat to its training missions.

Response This is the Commentor’s opinion and the FAA is unable to provide a meaningful response.

Comment 74 **1-5-44** With Tallahassee and Pensacola forecast to be the 8th and [sic] 4th fastest growing airports in the US by 2010, it appears to me, that this statement should be backed up by statistical evidence or The Sponsors [sic] strategic marketing plan. As of now commercial flights are off 50% from 2001 and no public announcement has been made on how PFN decision makers plan to make a turnaround. Increases in conflicts should be backed up by historical evidence that identifies where and when such conflicts occurred and why. Also, for example, What “Potential Increases” are anticipated and where do they generate?

Response See Appendix B for USAF consensus on effects of additional traffic at PFN on Tyndall mission.

Peterson Response to Your Response: What has affects on Tyndall Mission got to do with competing with Tallahassee and Pensacola?

Response The FAA responded to that portion of the original comment (identified as 1-5-44) to which FAA could formulate a meaningful response. The original comment as submitted to the FAA was a paragraph of new text in bold font which was inserted into the original text of the FAA’s DEIS. The inserted text immediately followed the DEIS’s discussion in Section 2.4.2.6 of constraints at the existing PFN location, specifically, airspace constraints related to the airport’s proximity to Tyndall Air Force Base. Because of the location and context within the DEIS in which the Commentor placed the comment, it was unclear to the FAA which “statement” was being referenced when the Commentor stated: “With Tallahassee and Pensacola forecast to be the 8th and [sic] 4th fastest growing airports in the US by 2010, it appears to me, that *this statement* should be backed up by statistical evidence or The Sponsors strategic marketing plan.” [emphasis added by FAA]. As such, FAA was unable to respond to the comment, as the FAA could not determine which statement the Commentor referenced or in what context the comment was being made. Assuming that the Commentor was asking the FAA to explain why PFN can be expected to compete with Tallahassee and Pensacola, the FAA does not consider these airports to be relevant to the analysis. The market area for PFN, as detailed in Section 1.6 of the FEIS, does not include the service areas for those airports.

Comment 75 (2-1-45) Peterson Response to Your Response: OK Question; How much will the FAA fund toward this project if the specific need is for a 6[,]800[-]ft runway?

Response The FAA decision on the level of funding will not be determined until after the ROD is issued. The ROD is the decision on the EIS, and the FAA decision on funding is a separate process. However, the FAA has advised the sponsor that, at this time, the costs of constructing only 6,800 feet out of the total 8,400 feet of the primary runway are eligible for AIP funding. This is consistent with facility needs identified using the FAA TAF and FAA’s independent runway length analysis.

Carl D. Petersen
I009 Individual Letter

Comment 76 (1-5-46) Peterson Response to Your Response: Same old tired buzzwords. I guess this is the reason that the Sponsor didn't answer the questions in your 18 August 2000 letter to Randy Curtis asking for comments on getting Southwest Airlines and would attract a larger share of traffic from outside the Southeast. Since these are anticipated demands by PFN, they didn't have to respond to your letter. Am I right?

Response Please see the Response to Comment 37 above.

Comment 77 **1-3-47** There is no reason to believe that the two airport concept could not work for PFN should the USAF approve joint operations for PFN's commercial air carriers.

Response Please see the discussion of the Joint Use alternative in Sections 3.2.5 and 3.4.4 of the FEIS. The FAA has not received a response from the US Air Force on the October 7, 2003 letter (included in Appendix D).

Peterson Response to Your Letter: See my comment at Par 3-1-1

Response Please see the response to Comment 44 above.

Comment 78 (1-3-48) Peterson Response to Your Response: See my Response at Par 3-1-[sic]

Response Please see the response to Comment 44 above.

Comment 79 **1-5-49** With only 12 flights/day, following USAIRs departure, the move to "The Sponsors" [sic] preferred relocation site is highly questionable. The current airport can and has accommodated aircraft up to the size of a B757 such as the: DC-9, B-727, B-737, B757, C141 and C-130. The limitation to operating from PFN is the weight and displacement limitations described in the Airport Facilities Directory based on wheel configuration (single, tandem, dual tandem). If the current airport can and has supported the aforementioned aircraft than it can support A320s and A319s and the B767 as long as the aircrew operated within the parameters established in the Airport Facility Directory and in accordance with the aircraft's operating instructions.

Peterson Response to Your Response: See my response to 1-5-40

Response Please see response to Comment 71 above.

Comment 80 **3-1-50** The West ay Site is located further from Bay County's population center than any other commercial airport in Florida. Travel time will vary but during the early morning and evening hours traffic is exceedingly heavy. Has any agency calculated the travel times for medical response teams that could be required in a major commercial aircraft accident on landing or takeoff when casualty assistance is immediately needed from the two **major** hospitals located within the county?

Response Relocation sites were determined in accordance with NPIAS criteria, see Section 3.2. The FAA does take into consideration accessibility of the proposed project to emergency services in identifying alternatives.

Peterson Response to Your Response: What is the FAA's criteria for emergency service accessibility?

Response This is not a comment on the FEIS or the adequacy of the analysis contained in the FEIS. The Commentor raised the issue of emergency service in his original comment (3-1-50) and the FAA has acknowledged that this issue is taken into consideration. The FAA does not set minimum criteria for location of airports to emergency services, including hospitals. All Part 139 airports are required to develop and adopt an airport certification manual. *See* 14 CFR Part 139.201. This manual includes an emergency response plan that requires the identification of each hospital and other medical facility on the airport or in the communities it serves, as well as a description of the facilities, equipment, personnel, and procedures for meeting the aircraft rescue and firefighting requirements referenced in Part 139.

Comment 81 (1-5-51) **Response** The FAA independently reviewed and assessed the runway length requirements and determined that 6,800 feet would accommodate the anticipated fleet mix for the potential markets that could be served non-stop from the airport [sic] Comment noted for the comment on general aviation.

Peterson Response to Your Response: Does this mean, if the Sponsor wants an 8400 ft runway, that the FDOT and the Sponsor will have to fund the other 1600 ft of runway elsewhere?

Response Please see the response to Comment 75 above. Regarding sources of funding other than federal funds, the FAA is not in a position to comment on what sources the Airport Sponsor intends to pursue.

Comment 82 (1-3-53) Peterson Response to Your Response. Gene Wintersole was a member of the 35th Fighter Wing's Operation Support Squadron and IS NOT a DOD representative. This is a gross misrepresentation of his level of decision making authority. Your EIS contractor/ consultant has significantly overstated his level of responsibility. Major General Egginton in his 25January 2005 letter to Ms Lane noted "fulfilling the mission requires either the maintenance of the current airspace configuration (SUAs, ATCAAs, and approach/ departure corridors) or the design of any new airport and associated approach and departure corridor s[sic] do not interfere with Tyndall's SUAs, ATCAAs. [sic] Approach and departures"

No where [sic] in his letter did he ask for new airspace, bring up an F22 need for airspace beyond which exists as described in his letter. In essence, being Wintersole's [sic] boss his need describes the mission needs of the Air Force not, now retired, Mr. Gene Wintersole.

Response The FAA properly coordinated with the military representatives that were made available to FAA for purposes of coordination on this project. The fourth sentence of the comment is consistent with what was presented in the EIS. The response to the Commentors earlier comment did not state that Mr. Wintersole's letter asked for "new airspace". The response to the comment stated Mr. Wintersole stated there might be the possibility of additional airspace requirements during a meeting prior to the publication of the DEIS.

Comment 83 (1-3-54) Peterson Response to Your Response: Major General Egginton's letter spells out the Air Force need for airspace to support 325th Fighter wing Mission/

Response The FAA acknowledges the comment.

Comment 84 (5-5-55) Peterson Response to Your Response: I strongly recommend that the FAA recognize the letter from Major General Egginton [sic], 5January 2005 that it be recognized as the Letter of Authority from the USAF

- Response** The Commentor implies that the letters received from Brigadier General New and Brigadier General Egginton have inappropriately been considered differently in the EIS. General New's letter was provided prior to publication of the DEIS and provides input from the DOD regarding the need to "de-conflict" civil aircraft operations and Tyndall Air Force Base. Thus, this letter was able to be considered in the development and screening of alternatives. By contrast, General Egginton's comments were provided in response to the DEIS, after the proposed action and reasonable alternatives had been crafted, in part, to address the need to de-conflict operations as identified by General New. In FAA's opinion, General Egginton's comments were made with the benefit of these concerns having already been addressed by the alternatives put forth in the EIS, and support the need to ensure that any alternative that the FAA may select as its preferred alternative does not in any way further complicate the complexity of the airspace or hinder the ability of Tyndall AFB to further its mission. It is not the purview of the DOD to identify a preferred alternative for this FEIS. Appropriately, General Egginton's letter does not identify a preferred alternative. The purpose of the "Compatibility with Airspace Configuration/Utilization" criterion is to ensure that any alternative would not increase the potential for airspace conflicts.
- Comment 85** (1-3-57) Peterson Response to Your Response: Jim Roncaglione told me this week (June 19-23 2006) that the US Navy's exercises in the area are using their aircraft carrier for its base of operation. Besides, in the 1970's we had Navy and Marine Corp fighter forces operating out of Tyndall AFB on a continuing basis. Someone is trying to reinvent the wheel with a congestion fear factor.
- Response** With respect to the first sentence, the FAA acknowledges the comment. With respect to the second sentence of this comment, this is a statement of opinion to which FAA is unable to provide a meaningful response. Concerns regarding airspace conflicts are documented in Section 2.4.2.1 of Volume I of the FEIS.
- Comment 86** (1-3-58) **Response** The concerns of the USAF and other branches of the military have been documented throughout the EIS process, and meeting summaries are included in Appendix B. The fact that a current situation exists in no way indicates that it is a desirable or efficient condition.
- Peterson Response to Your Response: I would recommend that the FAA get a letter from the senior commander at Eglin AFB for the record. I didn't see on in Appendix II or III.
- Response** FAA initiated coordination with the USAF/Eglin AFB at the outset of the EIS process. USAF personnel/staff from Eglin AFB were provided as contact points for the FAA during its coordination of the EIS. The FAA has coordinated with those representatives throughout the process. The FAA does not believe that further coordination regarding the EIS is necessary or appropriate.
- Comment 87** (3-3-59) Response to Your Response: Assuming you're referring to Ms. Lanes [sic] letter of 7October2003, she made an assumption that was wrong on page one and then advised the addressee B/G Larry New that Tyndall AFB was not being considered for joint use. See my comments on this issue in this document.
- Response** The Air Force was asked to provide additional input and comment on the concept of joint use of Tyndall in an October 7, 2003 letter to BG New. The FAA received no response to this letter. The FAA did consider a joint use alternative, as referenced in Sections 3.2.5 and 3.4.4.1 of the FEIS.

Carl D. Petersen
I009 Individual Letter

Comment 88 (3-3-61) **Response** The concerns regarding the F-22 were raised by the USAF, the operator of the aircraft, and not by the Airport Sponsor or the FAA.

Peterson Response to Your Response: The 35th Fighter Wing Commander has scotched that concern with his letter 5January 2005 letter concerning airspace needs. The low level expression of concern for the F22 has been shown to be invalid after three years of operational use.

Response This comment consists of statements of opinion and characterizations of communications between the USAF and the FAA, to which the FAA is unable to provide a meaningful response.

Comment 89 (2-5-62) Peterson Response to Your Response: You better go back to the FDEP since you've included in the FEIS the Sponsor's resale options(s) that could end up virtually assuring the destruction of Saint Andrew Bay. What is at risk is 350 plant species, 1782 invertebrate species, and 398 vertebrate species for a total 2520 species in an area of just 1144 [sic] sq. miles. By moving the airport to the West Bay and allowing the Sponsor, as an option, to advertise the existing property for sale with a concept that includes a 250 boat marina, a golf course, condominiums and retail stores, the FAA has opened up Goose and Robinson Bayou to pollution levels that, in perpetuity, will contaminate the immediate areas adjacent to the existing airport and in turn the bay. Add in the impact on West Bay across the bay and you have two pollution sources far worse than extending the existing runway to 6800 ft that will destroy much if not all of the biodiversity of St. Andrew Bay. I'm not an environmental expert but it seems to me a Supplemental Environmental Impact Statement (SEIS) is required on the resale option.

Response FAA does not have approval authority or jurisdiction over the ultimate uses that may be made of the existing airport site when it is redeveloped. However, FAA does have approval authority regarding transfer of the Airport Sponsor's grant obligations associated with the existing airport site, as well as approval authority for decommissioning of facilities and release of the lands (i.e., decommissioning and release) at the existing airport. Please see the response to Comment 10 above regarding FAA's compliance with NEPA with respect to disclosing the potential impacts of future redevelopment of the existing airport site.

The substance of this comment suggests that the proposed action (relocation of the airport) and redevelopment of the existing airport site and secondary development surrounding the relocated airport are connected actions under the meaning of the CEQ regulations 40 CFR Section 1508.25(a)(1). Regarding the first claim, redevelopment of the existing airport site after PFN has been relocated is not a federal action or approval. Assuming that FAA's future decisions regarding transfer of the Airport Sponsor's grant obligations and decommissioning of aviation facilities at the existing airport site are actions connected to the proposed relocation of PFN, impacts associated with decommissioning and release were evaluated in the Draft and Final EIS. There are no direct environmental impacts associated with decommissioning and release. Nonetheless, the FAA recognizes that future FAA action regarding decommissioning and release may have indirect impacts, particularly related to redevelopment of the existing airport site. To address these potential indirect impacts, the FAA evaluated the impacts associated with potential redevelopment of the existing site based on the best information available at the time of both the Draft and Final EIS. Such impacts are disclosed in the Draft EIS at Sections 2.2.2 and Chapter 5. As disclosed in the FEIS at Section 5.1, further revision to these impacts was disclosed using a composite redevelopment scenario based on the RFP and accompanying Redevelopment Report issued by the Airport Sponsor on October 2005. At this time, there is no approved plan for redevelopment. As explained in the

Carl D. Petersen
I009 Individual Letter

Response
Con't

EIS, the three scenarios presented in the RFP and Redevelopment Report represent only three proposals of a potentially limitless number of redevelopment options, any of which might be approved. Even when a final redevelopment option is selected, that decision is outside of the purview and authority of the FAA. Furthermore, there is no legal requirement for the FAA to delay issuing a decision on the proposed relocation of the airport in anticipation of future FAA action that is not ripe for decision at this time (decommissioning and release). Similarly, there is no legal requirement for the FAA to delay action on the proposed relocation of the airport pending completion of local decisionmaking regarding the ultimate uses of the existing airport site when and if it is redeveloped. Once FAA's decisions regarding decommissioning and release are ripe for review and approval, and more reliable information is available regarding the redevelopment plan that will be presented to local authorities for approval, additional NEPA evaluation will be undertaken.

1009

JUL - 5 2006

28 June 2006

Ms. Virginia Lane A.C.I.P.
Federal Aviation Administration
Orlando Airport District Office
5950 Hazeltine Drive
Orlando Florida 32822

Dear Ms. Lane:

I have attached my comments to the Final Environmental Impact Statement (FEIS) plus ~~seven~~ ^{FIVE (5)} additional attachments which I am forwarding as well to make them a part of the permanent record to be included with your Record of Decision.

I have perused the 22 lbs of documents and am forwarding my comments related to the FEIS comments as listed in Volume IV. Since I'm a novice when it comes to converting "read only" documents and DVDs to something I can use. I will reference my comments to my edited remarks that are consolidated with your response.

The attachments are my letters to you regarding those now infamous Tasks 5A & 5B; my letter to Ms Catherine Lang, Acting Associate Administrator for Airports, US Dept. of Transportation, Federal Aviation Administration, Washington D.C; three (3) letters I wrote to my Congressional Delegation, Senators Bill Nelson and Mel Martinez and Representative Allen Boyd; the St Joe letter to the Chairman Airport Board closing the deal in West Bay with attachments. I wish to have them made a part of the permanent record; and, for convenience, the Brigadier General Larry New letter of 3 September 2003. Second of all, I feel I have some unique credentials that may explain where I'm coming from.

I spent 34 years in the USAF enlisting at 18 in 1942; served for 37 years of which 33 years were active duty and the other being in the active reserves, did WWII in B17s as an aircraft commander; Korea as a squadron commander of the first all weather jet fighter squadron in that war; and, in Vietnam as an advisor to the Vietnamese Air Force where we developed the VNAF first Tactical Airlift Control Center for VNAF airlift operations. In 1955 I participated in developing the first integrated automated C3 system/battle staff exercise capability involving air defense radar squadrons, AF air defense air divisions and their numbered air force command for the western United States; one of the first live air to air weapons firings on an integrated automated air defense system in the late 1950s; and, served as an active pilot and commander of the training group supporting the Royal Saudi Air Force flying training programs in the F86 and T-33 aircraft. I lead an All American F-86 Aerial Demonstration Team

In addition, was a task force participant involved in the development of the concept of operations for the A-10 and A-7 tactical fighter aircraft; the concept for employment of tactical air forces to Third World countries operating from a main base, a forward operating base and a bare base which established the deployment concept and logistic support needs to do the mission; and, as Chairman of the Northern European Command's Command and Control Council (NATO) involving five nations land, sea and air forces where we developed a Tactical C3 system that reduced C3 interfaces from 23 to 5 based on the commander's concept (KISS).

In retirement as a consultant to Westinghouse Defense Electronic Systems and Computer Sciences Corp helped develop tactical air defense and civil air traffic control systems for Egypt, Saudi Arabia, Jordan, Israel, Turkey, Australia, NATO C3 systems and Canada, and the United States.

As commander of the USAF Air Defense Weapons Center Tyndall AFB our command consisted of approximately 90 fighters and jet trainers, a USAF Weapons Controller training mission, host to the ADC NCO Academy, USAF Civil Engineering Agency and Northeast Air Defense Sector. We were actively involved in joint training exercises with US Navy, Marine Corp and Air National Guard and our USAF major operating commands, TAC, PACAF and USAFE and Canada. We had no airspace problems, though Dan Rather, of 60 Minutes fame claimed we did. I probably have more time flying in Tyndall's airspace than any one involved in this issue civil, military or FAA except for the pilots flying the target aircraft.

With the above in mind I would hope that the FAA doesn't treat my comments as if I fell off the turnip truck. Now for added comments:

Brig Gen Larry New Letter, 3Sep 02002 This letter now nearly four years old has been used as a crutch by the Sponsor for the move of PFN from its present location to the proposed West Bay site since it was first written. Mention of the F22 has been used as a basis for the succeeding years as some sort of operational fighter that needs to safely operate in the local airspace as if no other fighter or jet trainer had the same problem. The F106 TO in either direction calls for acceleration to 400kts before initiating the climb. That's 460mpnh. So! How much different is the F22? The 325th FW flying safety office records only two near misses in two years, One (1) in 2004 and One (1) in 2005. This is not a high risk environment. Gen New writes; “--- it is not desirable situation to have commercial aircraft and high performance fighters operating in this close proximity.” Close proximity is never defined. With only one near miss in 2005 and 2004, it appears that safety is paramount in the eyes of the military pilots because close proximity has been avoided except on two occasions in 730 consecutive days.

In terms of expansion, he writes “Expanding the existing PFN facilities would present unique challenges and lead to greater conflict with TAFB operations, assuming the expansion would attract more commercial air carriers and larger aircraft.” There are two assumptions that are skipped over lightly in this sentence—“more commercial air carriers” and ... “large frame aircraft.”

PFN's down to 12 flights per day from 25 in May 2001. The Sponsor would be delighted if they could recover to their former operational stature prior to 11 Sept 2001. Do your aviation demand forecasts that reflect current and anticipated airline industry trends include a change in the aircraft fleet and load factors for PFN to include large frame aircraft, B747 and B777 type aircraft for PFN, and the accompanying load factors. Also does the FAA see a significant increase in legacy airline flights to PFN? If not, TAFB will have no problem. As of 6 June 2006 there were still 12 flights per day

The PFN Aircraft Activity Report for May 2006 shows Airline (includes Air Taxi) operations at 1313 operations. Most are air taxi operations not scheduled airlines. The 12 flights per day and one added flight on Saturday bring total commercial air operations to 728 operations of the 1313 for the month of May 2006 This is 55% of the “airline operations (includes air taxi)” and only 8.3% of the total PFN operations for May 2006; and 9.6% of total operations for the first five months of 2006. It should be noted, that the reduced capacity of the US commercial airline fleet, lead to the May 2006 load factor of 80% s the highest for any May in history

When it comes to the “deconflicting” of military air traffic with commercial airline traffic one needs to view the real world situation at PFN. The airline schedule for PFN shows the peak traffic hour for PFN is three per hour beginning at 9:00AM, 11:00AM, and 6:00PM. Further with Tyndall training operations tapering off after 6:PM and closed for weekends the chance for commercial airline traffic to be a threat to military operations or visa versa is insignificant. Where's the problem? Why doesn't the FAA prove there is a “near miss” scenario when Atlanta has a peak hour of 245 per hour and 2500 operations per day using five runways. As said in my response, attached, The FAA is either reckless at ATL or fleckless at PFN.

Further, the FAA should run a comparative analysis of the F22 units located at Langley AFB VA and Nellis AFB NV both of which are in high density commercial and GA operating areas; and also look at Eglin AFB FL, a joint use base with a private airport 4 miles to the south and two military auxiliary airfields with in the airport boundaries to see how it is done.

Major Gen Jack Eggington Letter, 5January 2005. Gen. Eggington's letter stresses retaining and using the existing airspace; and, its importance to the training mission. He does not reiterate the F22 problem and the need to “deconflict” military from civil aircraft nor seem to be worried about “large frame aircraft.” overcrowding the skies from the increase in air carriers alleged to be in the PFN forecast. His comments seem to me to bring common sense to the table and should be the basis for the PFN -Tyndall AFB operational relationship

The St Joe Co' Panama City-Bay County International Airport Relationship. I believe this relationship should be brought forward as it is the basis for initiating this relocation move commencing with the 17 November 1999 letter, almost six years ago. The letter from Mr. Peter S. Rummel, Chairman and Chief Executive Officer, St. Joe Company, is, in my opinion, the bottle that broke across the bow and launched the relocation project. I have also include a Standard and Poor's comment on the company and a long ten year stock trend analysis as well.

While the letter has several revealing features noted in my comments one important one is at the borrom of Page One(I):involving the land donation:

"It is further contingent on the Federal Aviation Authority's approval of the site, air space and commitment of funds for the airport's construction, as well as any other local, state and federal development and regulatory that may be required to initiate and construction and commence operations."

To date some \$33 million has been spent on this project and another \$45 million has been funded by the State of Florida and we've haven't received an approval on a Record of Decision from the FAA. I'm sure it's not the FAA's fault that this has occurred at the PFN level. I' convinced that the State of Florida who established the Airport Authority by PL 1677, a third revision from the charter approved in the late 1960s and the Bay County and Panama City Commissions have let the. Airport Authority run on too long without some outside oversight of their activities. 8

Environmental Issue. I am aware of the 13 environmental group's joint letter to the FAA and COE concerning the need for as Programmatic Environmental Impact Statement (PEIS); or, at least, a Supplemental Environmental Statement (SEIS) Why would the Sponsor get themselves in this hole by coming up with a concept for use of the old airport that may well have a more damaging environmental on St Andrew Bay than the runway extension proposed in 1998/1999. At that time John Robert Middlemas speaking on behalf of the *Committee for Sensible Airport Development (CSAD)* said: 9

"They wree unable to demonstrate a need for the extension based on safety, based on regularly scheduled flights, international charter or cargo flights. ** I think they have completely failed to make a case for need."**

"Both the environmental assessment and directors demonstrate a real lack of realization of the environmental damage that will be done by this project As to their proposal, I came in thinking they were a sham and now I'm convinced as ever as they are."

This assault was in 1998. Disruption of tidal patterns damage to shellfish beds and shellfish mating habits, and encroachment were all concerns. It was at this time that the News Herald noted that the Airport Board was looking at building a new airport and as they put it, "most likely on land owned by St Joe near West Bay. See attached letter from the CEO of St Joe company to the Chairman, Airport Board dated 17November 1999.

The St Andrew Bay is being assaulted from the West Bay and now from the current airport if it is to be disposed of. The St Andrew Bay's 1144 square miles contains some 350 plant species, 1782 invertebrates species and 398 vertebrates for a total of 2520 species. Does St Andrew Bay deserve to be destroyed as for the sake of expediency? At the minimum a Supplemental Environmental Impact Statement should be accomplished. The biodiversity of the bay needs to be preserved and nurtured not savaged by greed and a reckless disregard for the plants and creatures whose survival depends on it. 10

Statements for All Occasions. Throughout the responses there a number of them that are a too general in nature and leave the writer in limbo when it come to intent such as:

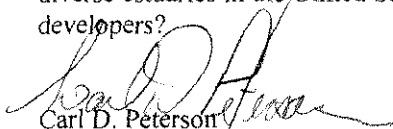
- **"Comment Noted"** This leaves the writer hung out to dry. Does it mean noted and agree or disagree? Can the writer assume the respondent agreed? Disagreed? Are the facts provided by the author accepted by the FAA responder. 11
- **"Aviation forecast are prepared based on anticipated demand and are not airline specific unless specific airline commitments are documented. The forecasts include a review of**

enplaned passengers and potential markets and the size of potential aircrafts that would serve these markets." At least you could have included a reference and a web site where the current FAA forecasts could be found, the date of the last forecast and what the trend was from the last report. Further you confuse the issue follow your own instructions. In one instance the FAA included the Airport Sponsor's forecasts to show potential range of effects. One sponsor's forecast showed as many as 1,500,000 passengers more than the FAA TAF from 2010 to 2020; and another Sponsor study forecasts of 500 B767 operations operating out of the Sponsor's new airport by 2018. It leaves on to wonder if the FAA is serious about a realistic potential range; or, buying in to the Sponsors dream.

- **Military Terminology** Here again the failure to identify military personnel by their appropriate rank and organization to which assigned was inappropriate and could have lead many readers to believe that the participants in joint civil-military activities were in positions of greater responsibility than their actual duty assignment. The an acronym, DOD, as used in the FEIS involving personnel at positions and a command six times removed from the DOD is a stretch.

In closing, I would like to comment on the problem of accountability and management. In my mind there has been very little. This project has been in the system for six years and with \$33 million spent and another \$45 million more to follow thanks to the Florida legislature and whatever the FAA is going to donate to the cause. We have yet to get to a Record of Decision and may not for quite sometime with some 13 environmentally oriented organizations insisting on, as a minimum, a Supplemental EIS to cover the sale and proposed use of the current PFN and other areas once the new facility is completed can lead one to believe along the way both federal and state oversight of this project has been nearly sorely missing; and, accountability has taken a back seat to expediency.

Finally, what aviation forecast do you have that reviews enplanements and potential markets, the size of potential aircrafts you expect to serve our market considering, at this time a lack of documented commitment by any airline for the FAA to agree relocate PFN airport. Will the FAA be a willing accomplice in the ecological destruction of St Andrew Bay that will follow to one of the most bio diverse estuaries in the United States? Is it an operational decision or a political decision to help avarice developers?


Carl D. Peterson
Major General USAF Ret.
808 Plantation Dr
Panama City Fl 32404
9850) 871-1575

- Attachments (1) Ltr V. Lane 6 June 2006
(2) Ltr C. Lang 14 June 2006
(3) Ltrs Martinez, Nelson, Boyd
(4) Ltr. P.S. Rummel CEO. St Joe, 17 Nov 1999
(5) Ltr BG New 3 Sept 2003

(6) ONE RESPONSE TO FEIS

Ms. Virginia Lane, A.I.C.P.
Federal Aviation Administration
Orlando Airport District Office
5950 Hazeltine National Drive
Orlando FL 32822

6 June 2006

Subject: The Panama City-Bay County International Airport DEIS-FEIS

Dear Ms. Lane:

Thanks for putting up with my message traffic concerning EIS Tasks 5A & 5B. You must think I fell out of the turnip truck on this issue; however, it was your last e-mail dated 31 May 2005 that opened my eyes as to why when you noted: "Kimley Horn initiated work on Task 5A in the spring of 2005 and Task 5B in the fall of 2005." This was a total surprise to those of us that are following the FAA/PFN EIS process as you can imagine if you were sitting in the Airport Authority board meeting and following their agenda as the sole source of your information bearing in mind what you knew and we didn't know on 28 March 2006.

Agenda Item No 4(c)(1): Accept Grant Funding of Phase 5A and 5B, date 28 March 2006, Atch One(1)

Background: "FAA has requested additional work scope described in Tasks 5A and 5B in order to complete the EIS process ***** "FAA is providing a grant that will fund 95% of the cost of the additional work" **No mention that the work on Task 5A had been initiated in the spring of 2005 nor Task 5B in the fall.** 18

Discussion "In Task 9 of Phase 4 Scope of Services **** identified potential additional tasks that might be required to complete the EIS process" **** "In order to respond to comments received on the Draft EIS, and to prepare and produce the Final EIS, the FAA has directed that additional tasks be completed. These additional tasks make up Phase 5B." **No mention was made that Task 5B was initiated in the fall of 2005** 19

"In November 2005, the FAA determined that the information in the Request for Proposals to Purchase the Existing Airport and the Background Analysis and Master Planning report for Redevelopment ***** need to be included in the Final EIS." This made up the tasks for Phase 5B. **Again, no mention that Phase 5B was initiated in the fall of 2005.** 20

Comment. My impression, when I listened to the 28 March 2006 Board discussions regarding the start of Tasks 5A & 5B that came about after November 2005 Draft EIS comments were received by the FAA, was that it was not so much enhancing the FEIS as it was the AIP grant that the Airport Authority was accepting because it had a positive impact on their FY2006 budget. This appeared to me to be more important than the "added" Task's 5A & 5B to enhance the Final EIS. 21

Agenda Item No. 4(c)(2): Kimley-Horn and Associates Inc. Environmental Impact Statement Phases 5A and 5B dated 28 March 2006, Atch Two (2)

Introduction: This item provides for the Board's approval of work to be conducted by Kimley-Horn and Associates, Inc. as part of the Environmental Impact Statement.

Discussion: "The Board has previously approved a Master Contract Agreement and various Task Orders with Kimley-Horn ***** FAA has directed that additional analysis be done before the issuance of the Final EIS. This item provides for Phase 5A and 5B of the work to be performed." **No mention here that the work was already accomplished before 28March 2006's approval.**

22

The additional tasks in Phase 5A included 17 tasks to complete the requirement at the new site and 22 tasks to be completed at the existing site with the words "additional tasks" used to identify each phase and a cost figure for each. Additionally, the Board is advised that "time is of the essence" to give the Board Chairman or his designee approval "to issue a Notice to Proceed" once grant funds have been obtained. Further, under "Action Required," management asks the board to issue a "Notice to Proceed for Phases 5A and 5B, contingent on receiving grant funding and Notice to Proceed from FAA and FDOT" and "execute the necessary documents with Kimley-Horn to do the work"

23

Comment: Does this type document with comments as cited above lead anyone in the public domain to believe that the work had already been accomplished or initiated as noted by you. in response to our e-mail dialogue commencing on 7May 2006 about Phase 5A and 5B?

The attachments illustrate in their entirety the tone and intent, if not the Airport Boards, certainly the PFN airport management who authored 28March agenda with/ without the knowledge of Kimley-Horn's completion or initiation of Phases 5A & 5B, as you noted, in the spring and fall of 2005. Furthermore, Kimley-Horn's itemized proposals for Task 5A and 5B are dated January 2006 and the language throughout is in the future tense. "The Consultant will..." It would seem to me that you had nothing to hide since you were quite candid in your 31May 2006 e-mail; so why the nuanced language in the Airport Board's agenda and K-H's proposal as noted above. I have done a good deal of consulting work and I find it highly irregular to do a million dollars worth of work without a task order and then be compensated without acknowledging the irregularity. I call it D-cubed for Deceit, Deception, & Disinformation.

I apologize for taking up so much of your time on this issue; but, on 28March 2006 I was one of many attending that Board meeting who have our own views on airport relocation. We would be classified and categorized by the late P.T. Barnum as one of those suckers born every minute; but, we are paying attention and we expect to see the proper process being followed

Warm regards,

Atch One: Agenda Item No. 4(c)(1)

Atch Two: Agenda Item No. 4(c)(2)



Carl D. Peterson
Major General USAF Ret.
808 Plantation Drive
Panama City, Fl 32404-8629
(850) 871-1575
vikingsword@juno.com

PS: Note this letter's date. In 1944 it was D-Day during WW II. I didn't start my combat tour until 12 October 1944. There were a lot of heroes on that day along with the casualties. I didn't know it would be my destiny to be writing you 62 years later about people who have abused the system or process, call it what you will. Those types didn't last long in combat because their comrades couldn't trust them and shipped them to the rear where they could do little harm. Some were cowards. Some were just no damn good. Fortunately they were few in number.

Ms. Catherine M. Lang
Acting Associate Administrator
For Airports
U.S. Department of Transportation
Federal Aviation Administration
800 Independence Ave. SW
Washington DC 20691

14 June 2006

Dear Ms. Lang:

I appreciate your 28 April 2006 response to my letter forwarded to you by Senator Mel Martinez. I would have responded sooner but elected to wait until I had a chance to make at least a cursory review of the FAA's Final Environmental Impact Statement (FEIS) on the proposed relocation of the Panama City-Bay County International Airport (PFN). I received a print copy in mid May (all 22lbs of it) plus a CD version with a cover letter. Before commenting on the FEIS, I'd like to take exception to one of your comments. I'm referring to: "We are aware the airline industry is undergoing some financial challenge." As I see it, it is more than "some financial challenge"

I am enclosing a copy of my examination of the commercial airline industry (Attachment One: A Snapshot of the Commercial Aircraft Industry, Updated 10 November 2005) that is part of the FEIS but apparently ignored or unread in their analysis. A quick summary reveals the following since 9/11.

- The seven largest legacy carriers have withdrawn 722 aircraft from service since 2000. Jet providers have increased the withdrawal even further
- Industry employment was reduced from 442,800 to 354,000 including 10,000 pilots, well Delta just rehired 59.
- The ATA estimates 2,200 daily flights were cut by 2003.
- Losses within the industry now exceed \$35 billion.
- Since 2001 PFN has lost Tampa and Dallas Fort Worth as destinations and has had flights and capacity reduced by 52%.
- PFN has only Jet Providers with aircraft inventories as small as 30 aircraft flying into and out of this airport at this time. Both mainline carriers for whom they are under contract are in bankruptcy and have cut their capacities by nearly 25%.
- Passenger traffic at PFN continues to decline with a 5% loss in 2005 and 2006 YTD is down an additional 5.74%. Three of the last five years has shown declines.
- PFN air fares are often near exorbitant compared to neighboring commercial airline facilities such as Pensacola and Okaloosa Regional Airports.
- Legacy carriers are not filling voids in service when low cost carriers pull out or collapse as did Independence Air

With the above in mind I did read through significant segments of the FEIS and will respond as appropriate before the 7 July 2006 deadline. There are a couple of areas that puzzle me.

As the former commander of the USAF Air Defense Weapons Center, Tyndall AFB FL from February 1973 to June 1977, I am intimately familiar with military air operations from that base when there was a complement of aircraft totaling over 90 jet fighter and training aircraft assigned at the time. Further our training programs included joint training with US Navy and Marine Corp fighter units (both active and reserve) as well as those assigned to USAF Tactical Air Command, USAFE and PACAF plus Air National Guard and Canadian Air Forces. At times we had up to 160 fighters on the base for air exercises ranging from weapons meets, dissimilar air combat

training, air defense exercises plus normal training missions; and, of course an unmanned drone operations involving, at the time, the F102 operating off the main runway pending the construction of a drone runway. In addition, we had an air defense mission with aircraft on 24 hour alert seven days per week. Finally, we had pretty much the same airspace that TYN has today. I don't believe it has changed much in the past three decades if not longer. Busy? You better believe it was. Today TYN is a whimper of its former self.

It is interesting to note that the FEIS contains letters from two (2) AF generals. One letter from B/G Larry D New, dated 3Sept.2002, Volume II Appendix, cites the need to "deconflict" traffic in order to avoid putting "commercial aircraft and high performance fighter aircraft in close proximity" which is a distance of nine nautical miles. He notes that the move would facilitate the deconfliction of the respective airfields traffic. BG New's letter is not classified as a response from a federal agency as identified in Volume III: Responses to Comments Federal, State, and Local Agencies; however, BG Jack Egginton, Commander 325thFighter Wing, dated 25Jan 2005 is listed as an US Department of Defense – Department of the Air Force input

BG Egginton's letter emphasizes the integrity of and access to the current airspace set aside for the qualification of combat ready F-15 and F-22 pilots and the need to maintain the current configuration in order to maintain the combat capability of the Air Force. He also notes that the Panama City VORTAC is a critical NAVAID for the local flying environment. The FAA's response was to note the comments on the airspace needs and the VORTAC would be relocated if PFN is relocated provided the same degree of coverage can be achieved. Nothing is said about what takes place if the VORTAC coverage is inadequate and does not meet TYN's operational needs in the new location.

In my opinion, BG Egginton's comments are the primary concern in so far as the Air Force is concerned simply because the loss of airspace would be detrimental to the Air Force mission at TYN. BG New's view of the situation and the Sponsor's hanging its case for relocation on it is wrong. Here are Two (2) reasons why:

Reason One: According to the 325thFighter Wing's Airspace Management Chief and the wing's flight safety office the AF training operations experienced one (1) single "near miss" in 2005 and one (1) single near miss in 2004. Both incidents involved VFR incursions into special use airspace and not airline or other jet aircraft using coordinated routes and procedures that are supposedly "potential conflicts." There is no reason to believe that relocating the civil airport will reduce the incidents of wandering VFR pilots. While it doesn't reflect the number of encounters in Special Use Airspace, it does indicate that the radar agencies, to the maximum extent possible, provide effective traffic calls and avoidance vectors when and as required.

According to 325th FW authorities the procedures for working traffic in and out of PFN has been refined over the years and there is little or no impact to either military or civil air traffic. While there are frequent delays for both military and civilian aircraft to depart, the FAA doesn't consider anything a delay until the delay is at least 10 minutes. Seldom does Tyndall air traffic control have to delay an aircraft over 10 minutes due to traffic.

Reason Two: Just how busy are both PFN and TYN with respect to air traffic operations? The data illustrated comes from the 325th Fighter Wing Airspace Management Division and from PFN's Air Activity Report for the year 2005

Air Operations – landings and takeoffs

Unit	Monthly	Weekly	Daily	Hourly
Tyndall AFB	7386	1846	369	23
Panama City Apt	7246	1811	242	15
Total	14632	3657	611	38*

*Based on five day week. TYN is closed Sat/Sun. PFN's 15 per hour is the sole Sat/Sun operations

Source: TYN data for calendar year 2005

PFN data based on PFN Activity Report for Jan/Apr 2006 period

Hourly data based on 16 hour day

Just think that with a combined total of 175,584 landings and take offs in 2005 only one near miss occurred in 2005 which is certainly insignificant and certainly is no justification for moving the PFN Airport from its current location. There was also only one near miss in 2004. So!! What is the reason for the move? It cannot be flying safety with a record as above.

I cannot believe that the TYN's Approach Control personnel and capabilities, as shown above, suggests they are incapable of handling this so-called traffic "congestion" on a daily basis with the airports separation of ten miles.

Further, I cannot understand how the FAA supports the Sponsor's alleged clash of military and civil aircraft at TYN and PFN when they have a commercial airport with about 2600 operations per day with a peak hour of 245 operations including a fifth new runway all within 2 miles of each other (I'm referring to Atlanta) and disapprove the current PFN and TYN's three runway operation, about 16 operating hours per 5 day week with 3 runways 10 miles apart and opt for a relocated PFN in the hinterlands of Bay County—West Bay.

Just within the past few weeks the FAA (Using Kimley-Horn on both projects) and the ATL Sponsor announced their intent to operate 240+ operations PER HOUR on five runways within 2 miles of each other, with FTK 10nm away (346 ops/day), PDK 16nm away (639 ops/day) and MGE 17nm away (private use/military including F/A 22 manufacturing test flights). The "complexity" of turning the ATL operation from an east approach to a west approach or vice versa must exceed the cumulative alleged "complexity" and "potential of conflicts" of PFN airspace for years if not decades to come. One may conclude that the FAA is either reckless at ATL or fleckless at PFN.

Further, you can rationalize that using the same consultant on both ATL and PFN projects, Kimley-Horn and Associates, had some bearing on the decision. As far as I can determine the FAA's "District Office" did not even seek an official opinion from FAA's airspace experts, but relied solely upon the Sponsor's solicited comments from the long since departed 35th Fighter Wing Commander whose letter was misunderstood by PFN Airport Authorities and subsequently ignored by his successor, the wing commander whose comments are carried in Section III of the FEIS, B/G Jack Eggington. His comments are more directed toward the real issue – air space control -- and more benign than those of the since departed former commander. One gets the impression that the FAA is acting arbitrarily when it sets out to relieve "potential conflicts" rather than applying its own resources to solving a miniscule problem of allocating airspace as cited above rather than looking at all reasonable and prudent alternatives, but instead falls on the Sponsor's word as the "Final Solution."

In addition, all one has to do is look at Pensacola Regional Airport with The US Navy's Blue Angels located at Sherman Field just nine miles from PNS with a restricted area from zero to 4200ft for aerobatic demonstration training purposes; and, throw in Okaloosa Regional Airport with its joint use lease good until 2031 with Eglin AFB home to a F15 tactical fighter wing, an Air Force weapons test and evaluation mission, two auxiliary airfields with SOF C130 aircraft and helicopters; a private airfield four miles south with 100 plus aircraft; and, then add in the future tri-service/international A-35 Strike Fighter program and now you may have air traffic congestion the likes of which will never be seen in Panama City-Bay County International Airport area for years and perhaps decades to come. I haven't heard a call for anyone to move, relocate or shutdown either of these two airports

Can you rationalize this approach to airport relocation other than giving the sponsor what they want; or alternatively, justify your rationale for the proposed relocation? Frankly, having spent 37 years of my life flying high performance fighter aircraft covering the 49 states, 22 foreign countries, three wars, a tour in Saudi Arabia, two years of cold war operations in the northern tier of NATO coping with Russians; helping develop several US and foreign military air defense and tactical air command and control systems; and, foreign civil air traffic control systems, I find this PFN relocation project cannot stand on its own two feet either from a necessity or operational point of view

Finally, I am not an environmentalist by any means but some dichotomies show up that I can relate to when the sale of the airport property comes to the front and center. I am referring to the FEIS that involves the Sponsor's plans for sale and redevelopment of the current airport. The data included in the EIS, Table 2-1, Existing Site Redevelopment Options ... includes four variable scenarios the first of which boggles my mind. It includes a 250 slip marina.

Excerpts from Atch.. Two (2), A Mystery Wrapped in an Enigma As early as 1997 words appeared in the Panama City News Herald written about the Airport Authority expressing their need for a runway extension. With the passage of Public Law 98-727 and signed into law on 24May 1998, the Airport Authority, four days later, held a public hearing on a proposed 2200 ft runway extension. The News Herald reported that those attending the meeting were polled and 118 opposed the extension, 37 were in support and 10 were neutral. At that time the environmentally oriented and prominent citizen in the community John Robert Middlemas was quoted at the public hearing as saying:

“They were not able to demonstrate a need for the runway extension based on safety, based on regularly scheduled flights, international charters or cargo flights.... I think they have completely failed to make a case for need.”

“Both the environmental assessment and the directors demonstrate a real lack of realization of the environmental damage that will be done by this project. As to their mitigation proposal, I came in thinking this was a sham and now I'm convinced as ever as they are.”

How sensitive is our environment? The Indian River Lagoon on the east coast of Florida is part of the National Estuary Program (NEP) and it was believed to have had the highest number of species for any North American estuary. Subsequent to the original findings it was revised in 1994. A comparison Of the Indian River Lagoon with our St Andrew Bay and using the Indian River Lagoon criteria, St Andrew Bay inventory would add 206 species more to the list. That

would include 17 species of fish, 3 species of amphibians, 10 species of reptiles, about 100 species of birds and 32 species of mammals. Atch. Three (3) is the source for this information

Now we have a 2200 ft runway extension thrown out and a 250 marina slips substituted as the contaminator of Goose Bayou that, in the long term, will more than likely cause more environmental damage than the runway extension when you add in a golf course, condominiums and retail outlets. So what we have is the destruction of St. Andrew Bay's biodiversity with the ruination of Goose and Robinson Bayou, the destruction of two creeks and surrounding terrain at the proposed location; and, the outward reach of such destruction will eventually ruin the St Andrew Bay biodiversity, one of our main attractions. Just this past Sunday 11 June 2006 it was reported that the miniscule Panama City Crayfish has been put on the threatened list. How many more will be added to the list as the destruction of land and sea habitat takes place to bring a new airport to Bay County that handles a robust 12 commercial airline flights per day.

I'm no expert; but, living on the water (Callaway Bayou) one house down from a storm water run off outlet, For 25 years I've seen sand from the open storm water runoff "dirt drain ditches" than I care to. I've watched the damage done to sea grass beds that used to be adjacent to our home and one house down from me ceased to exist. The water is so shallow that the duck's bellies are above the water

In conclusion the FAA and the State of Florida are funding an airport relocation somewhere between \$300 to \$400 million with land use proposals that could well destroy the biodiversity of St Andrew Bay. For what? A commercial aviation operation which has been cut by 52% leaving 12 flights per day with no military/civil aircraft traffic problems; and, the F-22's presence for the last three years not being a threat to or threatened by civil/military air operations? It leads me to believe this is more a land deal and not an airport deal.

I am forwarding a copy this letter to Ms. Virginia Lane, Orlando Districts Office and Florida's Senator Martinez, Senator Nelson and Congressman Boyd. I look forward to your response and hope it will contain serious and cogent comments.

Warm regards

Carl D. Peterson
Major General USAF Ret.
808 Plantation Dr
Panama City, Fl 32404
(850) 871-1575

Atch One (1): Snapshot of the Commercial Airline Industry
Atch Two (2): PC-BC Airport relocation
Atch Three(3): Biodiversity Comparison Indian River & St.
Andrew Bay

17 June 2006

Senator Mel Martinez
317 Hart Senate Office Building
Washington DC 20510

Dear Senator Martinez

On 17 October 2005 I mailed you a letter regarding the impact of the decline of commercial aviation industry on the Panama City-Bay County International Airport and its proposed relocation. You advised me, some six months, later that my letter had been forwarded to the FAA.

On 28 April 2006 I received what we in the Air Force would call "Bed Bug Letter No. 4." In essence I was stiffed by the recipient of your letter, Ms Catherine M. Lang, Acting Associate Administrator for Airports, The last sentence of her letter "Please be assured we will also consider comments from the public" left the door open and the attached correspondence was mailed to her on 16 June 2006. Quite frankly, I unloaded on her just to make sure that my views are a matter of record at the FAA Washington DC offices; and, for no other reason than I'm tired of getting the diplomatic run around from an agency whose record for efficiency is suspect.

I am requesting, not that you read the package and comment on it, but that you insure that the FAA responds to my letter with written comments devoid of such words as "noted" or words and statements that are what I call glittering generalities and/or emotional appeal. Since 911 there has been a major change in commercial aviation industry and its back wash at Panama City - Bay County International Airport. Such things as an unfounded traffic conflict between military and commercial aircraft; the drawdown of commercial airlines servicing our airport by 52%; rising construction and operating costs, fewer passenger boarding's; the expenditure of funds exceeding \$33 million to date with an additional Florida budget allocation of \$45 million; and, last but not least the potential environmental destruction of St Andrew Bay that's biodiversity exceeds that of the Indian River Lagoon, currently in the US National Estuary Program.

24
25

It seems to me that the other side of the issue - no airport relocation or move at this time - needs to be heard. I don't know about anyone else, but I seem to have struck out with you on this issue which, in my opinion should be of major concern for you. On your last visit here, the local Republican power brokers kept you away from those of us who disagree with the proponents of the relocation which serves to conform that it's a land deal not an airport deal. Are you "fair and balanced?"

26

Sincerely yours

Carl D. Peterson
Major General USAF Ret.,
808 Plantation Drive
Panama City FL 32404
(850) 871-1575

One(1) Atch. Ltr to Ms C.M. Lang/FAA-DC

Congressman Allen Boyd
1227 Longworth House Office Building
Washington D.C. 20515-0902

17 June 2006

Dear Congressman Boyd:

On 17 October 2005 I mailed you a letter regarding the impact of the decline of commercial aviation industry on the Panama City-Bay County International Airport and its proposed relocation. I did not receive a response from your office; and, assume it went sight unseen. Senator Martinez advised me, some six months, later he had forwarded my letter to the FAA.

On 28 April 2006 I received what we in the Air Force would call "Bed Bug Letter No. 4." In essence I was stiffed by the recipient of his letter, Ms Catherine M. Lang, Acting Associate Administrator for Airports, The last sentence of her letter "Please be assured we will also consider comments from the public" left the door open and the attached correspondence was mailed to her on 16 June 2006. Quite frankly, I unloaded on her just to make sure that my views are a matter of record at the FAA Washington DC offices; and, for no other reason than I'm tired of getting the diplomatic run around from an agency whose record for efficiency is suspect.

I am requesting, not that you read the package and comment on it, but that you insure that the FAA responds to my letter with written comments devoid of such words as "noted" or words and statements that are what I call glittering generalities and/or emotional appeal. Since 911 there has been a major change in commercial aviation industry and its back wash at Panama City - Bay County International Airport. Such things as an unfounded traffic conflict between military and commercial aircraft; the drawdown of commercial airlines servicing our airport by 52%; rising construction and operating costs, fewer passenger boarding's; the expenditure of funds exceeding \$33 million to date with an additional Florida budget allocation of \$45 million; and, last but not least the potential environmental destruction of St Andrew Bay that's biodiversity exceeds that of the Indian River Lagoon, currently in the US National Estuary Program.

It seems to me that the other side of the issue - no airport relocation or move at this time - needs to be heard. I don't know about anyone else, but I seem to have struck out with you on this issue which, in my opinion, should be of major concern for you. While you may disagree with our stand on this issue, the failure to hear our side of the story serves to conform that it's a land deal not an airport deal. Are you "fair and balanced?"

Sincerely yours

Carl D. Peterson
Major General USAF Ret.,
808 Plantation Drive
Panama City Fl 32404
(850) 871-1575

One(1) Atch. Ltr to Ms C.M. Lang/FAA-DC

Senator Bill Nelson
716 Hart Senate Office Building
Washington D.C, 20510

17 June 2006

Dear Senator Nelson:

On 17 October 2005 I mailed you a letter regarding the impact of the decline of commercial aviation industry on the Panama City-Bay County International Airport and its proposed relocation. I did not receive a response from your office; and, assume it went sight unseen. Senator Martinez advised me, some six months, later he had forwarded my letter to the FAA.

On 28 April 2006 I received what we in the Air Force would call "Bed Bug Letter No. 4." In essence I was stiffed by the recipient of his letter, Ms Catherine M. Lang, Acting Associate Administrator for Airports, The last sentence of her letter "Please be assured we will also consider comments from the public" left the door open and the attached correspondence was mailed to her on 16 June 2006. Quite frankly, I unloaded on her just to make sure that my views are a matter of record at the FAA Washington DC offices; and, for no other reason than I'm tired of getting the diplomatic run around from an agency whose record for efficiency is suspect.

I am requesting, not that you read the package and comment on it, but that you insure that the FAA responds to my letter with written comments devoid of such words as "noted" or words and statements that are what I call glittering generalities and/or emotional appeal. Since 911 there has been a major change in commercial aviation industry and its back wash at Panama City - Bay County International Airport. Such things as an unfounded traffic conflict between military and commercial aircraft; the drawdown of commercial airlines servicing our airport by 52%; rising construction and operating costs, fewer passenger boarding's; the expenditure of funds exceeding \$33 million to date with an additional Florida budget allocation of \$45 million; and, last but not least the potential environmental destruction of St Andrew Bay that's biodiversity exceeds that of the Indian River Lagoon, currently in the US National Estuary Program.

It seems to me that the other side of the issue - no airport relocation or move at this time - needs to be heard. I don't know about anyone else, but I seem to have struck out with you on this issue which, in my opinion, should be of major concern for you. While we may disagree with your stand on this issue, the failure to hear our side of the story serves to conform that it's a land deal not an airport deal. Are you "fair and balanced?"

Sincerely yours

Carl D. Peterson
Major General USAF Ret.,
808 Plantation Drive
Panama City Fl 32404
(850) 871-1575

One(1) Atch. Ltr to Ms C.M. Lang/FAA-DC

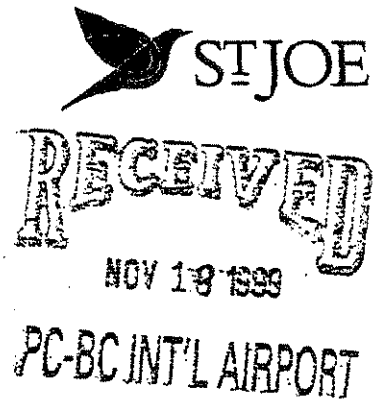
30

31

32

Peter S. Rummell
Chairman
Chief Executive Officer

November 17, 1999



Mr. Donald Crisp
Chairman
Panama City, Bay County Airport and Industrial District
3171 Airport Road, Box A
Panama City, FL 32405

Dear Don,

First, let me commend you and your Board for your vision and leadership. The St. Joe Company strongly supports your efforts to enhance air service in the Northwest Florida region. We are committed to working together with you and community leaders to realize the great future that is Northwest Florida's destiny.

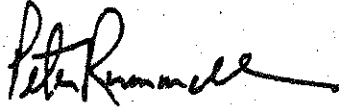
The bridge to our bright future is dependent, in so many ways, on the development of a truly regional commercial and industrial service airport. Having explored the options, we agree with your conclusion that the best, and perhaps only way to realize this objective, is to study the relocation of the existing Panama City/Bay County Airport. While the existing facility is superb in so many ways, it is limited in its potential to expand and keep pace with the growth that our area is already experiencing and that will accelerate dramatically in the near future. The constrained existing facility is already limiting the coastal Panhandle's tourism and hospitality industry and has severely limited manufacturing and industrial development. We know first hand. These constraints have limited the execution of our future business plans. Moreover, there is no way to estimate the loss in revenues and jobs that our region has already suffered. It is becoming more and more clear that a replacement airport is a necessity. Doing nothing is not an option. Designed with a regional perspective and the infrastructure and land resources to take advantage of the opportunities before us, a relocated Panama City/Bay County International Airport is the best vision to accommodate our region's future air service demand.

In order to assist your efforts, please consider this letter as a statement of intent, on behalf of The St. Joe Company, to dedicate approximately 4,000 acres designated for aviation operations, industrial uses and environmental mitigation in connection with construction of an improved new airport facility. The scale of this proposed facility is more than four times the size of the current airport and represents The St. Joe Company's commitment to assist you in developing a plan that will address Northwest Florida's air traffic demands well into the future. While we understand that the location of the site has not yet been determined, our proposed action is contingent upon the site being located in West Bay County and generally in the twelve mile area along County Road 388 between State Road 79 and State Road 77. It is further contingent on the Federal Aviation Authority's approval of the site, feasibility, air space and commitment of funds for the airport's construction, as well as any other local, state and federal development and regulatory

approvals that may be required to initiate construction and commence operations. We understand that additional lands may be necessary for environmental mitigation. While the scope of this effort has not yet been determined, we understand that a progressive environmental strategy is vital to the success and quality of this proposed development. Therefore, we intend to support this effort appropriately and look forward to working closely with you to define a successful strategy that will become a source of pride for all of Bay County and Northwest Florida.

We stand ready to work with you to formalize the details of this proposal as soon as possible.

Sincerely,

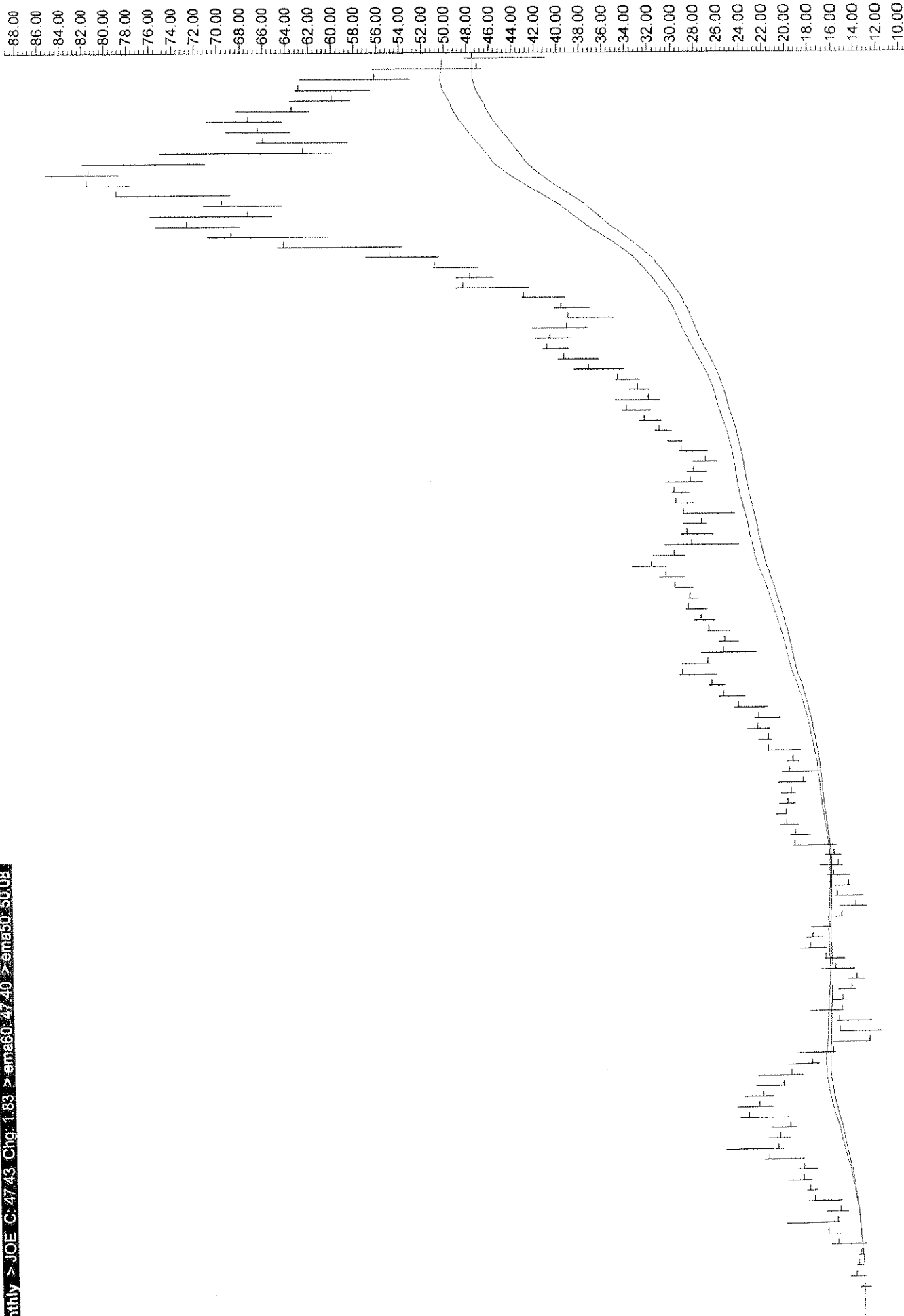


Peter S. Rummell

PSR/m

c: Chris Corr
Randall Curtis

Monthly > JOE C: 47.43 Chg: 1.83 > ema60: 47.40 > ema50: 50.08



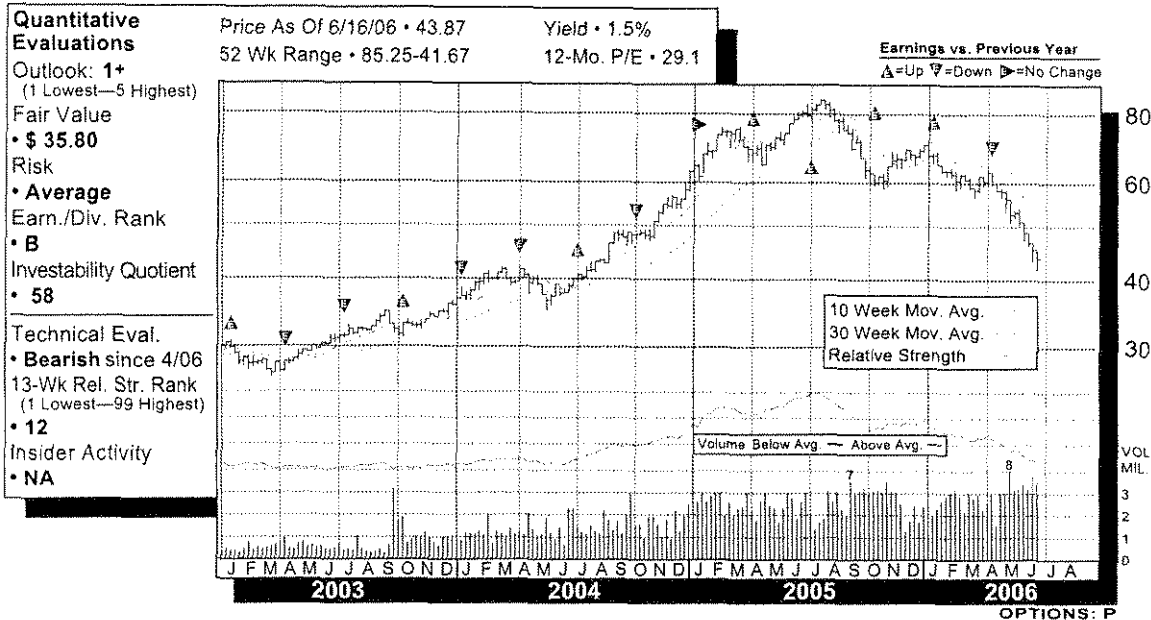
Sep-96 Apr-97 Nov-97 Jun-98 Jan-99 Aug-99 Mar-00 Oct-00 May-01 Dec-01 Jul-02 Feb-03 Sep-03 Apr-04 Nov-04 Jun-05 Jan-06

STOCK REPORTS

GICS Sector: Financials

Sub-Industry: Real Estate Management & Development

Summary: Based in Florida, JOE is engaged in town, resort, commercial, and industrial development; and land sales.



Business Profile - February 16, 2006

In early February, JOE projected 2006 EPS at \$1.70 to \$2.15, with the range reflecting the lumpy nature of earnings and cash flows inherent to the land development business and variability in the timing of several transactions. JOE anticipates a slow start in 2006, with the majority of earnings occurring later in the year. The company is looking for positive contributions from new residential products and projects, and continued solid performance from its primary home communities. JOE believes that over the past several years it has made progress in securing a wide range of residential and commercial entitlements for its low-basis land holdings. The company expects 2006 results to begin to reflect this progress, with new product and sale opportunities coming to fruition in each of its segments. However, JOE also expects results to reflect a recent slowdown in sales of existing resort residential product.

Operational Review - February 16, 2006

Total revenues from continuing operations for 2005 (preliminary) advanced 11% from those of the year before, as a 12% increase for dominant real estate sales, and gains of 32% for rental revenue and 3.2% for other revenues outweighed a 20% drop for timber sales. The higher revenues, wider gross margins for both real estate sales and rental revenue, and the absence of a \$2 million impairment loss enabled pretax income to move ahead 30%. After taxes at 37.2%, versus 39.4%, and large increases for both minority interest expense and equity in income of unconsolidated affiliates, income from continuing operations surged 36%, to \$114 million (\$1.49 a share), from \$84 million (\$1.09). Results were before earnings from discontinued operations of \$0.17 a share, versus \$0.08.

Stock Performance - Jun 16, 2006

In the past 30 trading days, JOE's shares have declined 17%, compared to a 6% fall in the S&P 500. Average trading volume for the past five days was 1,406,520 shares, compared with the 40-day moving average of 1,249,108 shares.

Key Stock Statistics

Dividend Rate/Share	0.64	Shareholders	87,000
Shs. outstg. (M)	74.6	Market cap. (B)	\$ 3.3
Avg. daily vol. (M)	1.365	Inst. holdings	69%
Tang. Bk. Value/Share	5.13		
Beta	0.67		

Value of \$10,000 invested five years ago: \$ 17,506

Fiscal Year Ending December 31

	2006	2005	2004	2003	2002	2001
Revenues (Million \$)						
1Q	167.3	184.7	181.5	146.5	121.7	140.1
2Q	—	260.3	232.6	184.5	145.5	259.4
3Q	—	235.5	246.2	200.8	152.5	224.6
4Q	—	257.7	219.3	226.4	226.7	244.4
Yr.	—	938.2	951.5	760.6	646.4	868.4

Earnings Per Share (\$)

	2006	2005	2004	2003	2002	2001
1Q	0.05	0.20	0.17	0.18	0.87	0.13
2Q	—	0.50	0.30	0.13	0.15	0.29
3Q	—	0.35	0.28	0.30	0.15	0.19
4Q	—	0.44	0.37	0.37	0.70	0.23
Yr.	—	1.50	1.11	0.98	1.85	0.83

Next earnings report expected: late-July

Dividend Data (Dividends have been paid since 1990.)

Amount (\$)	Date Decl.	Ex-Div. Date	Stock of Record	Payment Date
0.160	Aug. 31	Sep. 13	Sep. 15	Sep. 30 '05
0.160	Dec. 01	Dec. 13	Dec. 15	Dec. 30 '05
0.160	Feb. 15	Mar. 13	Mar. 15	Mar. 31 '06
0.160	May. 17	Jun. 13	Jun. 15	Jun. 30 '06

For important regulatory information, go to www.standardandpoors.com, "Regulatory Disclosures."

All of the views expressed in this research report accurately reflect our quantitative research models regarding any and all of the subject securities or issuers. No part of our compensation was, is, or will be, directly or indirectly, related to the specific recommendations or views expressed in this research report.

This report is for information purposes and should not be considered a solicitation to buy or sell any security. Neither S&P nor any other party guarantees its accuracy or makes warranties regarding results from its usage. S&P receives compensation from the issuer or an agent thereof for initiating coverage, and for distribution including licensed redistribution of this report, and/or for inclusion in other S&P publications, generally in amounts up to U.S. \$14,175 per year. Redistribution is prohibited without written permission. Copyright © 2006

Business Summary - February 16, 2006

The largest private landowner in Florida, The St. Joe Company is a real estate operating company engaged in town and resort development, commercial and industrial development, and land sales. It also has significant timber interests. Most of JOE's land is located in Northwest Florida. Total land holdings amounted to about 820,000 acres as of year-end 2004, including about 352,000 acres within 10 miles of the Florida coast.

The company believes it is one of the few real estate operating companies to have assembled the range of real estate, financial, marketing and regulatory expertise necessary to take a large-scale approach to real estate development and services. JOE's strategy includes continuing to seek to reposition its timberland holdings for higher and better uses, making full use of market analyses, land use/zoning changes, and the parceling of its land holdings.

Revenue sources by segment in 2004 were: Towns & Resorts development 65%, commercial real estate development and services 24%, land sales 7.6%, and forestry 3.7%. Commercial real estate services operations were sold in September 2005.

The Towns & Resorts development segment develops large-scale, mixed-use communities primarily on land that JOE has owned for a long period of time. JOE owns large tracts of land in Northwest Florida, including significant Gulf of Mexico beach frontage and waterfront properties, and in west Florida near Tallahassee. In addition, JOE is engaged in residential homebuilding in North Carolina and South Carolina through its Saussy Bur-

bank, Inc. subsidiary. JOE was also a partner in five joint ventures that own and develop residential property, as of year-end 2004.

The commercial real estate development and services segment sells developed and undeveloped land and in-service buildings, generates rental revenue through its portfolio of buildings purchased with tax-deferred proceeds and buildings it developed, and owns and develops commercial properties through several subsidiaries and partnership ventures. The Advantis Real Estate Services subsidiary, which was sold in September 2005, provided commercial real estate services including brokerage, property management, and construction management.

The land sales segment markets developed and undeveloped land parcels for a variety of rural, residential and recreational uses on a portion of JOE's long-held timberlands, primarily in Northwest Florida.

The forestry segment focuses on the management and harvesting of JOE's timberland holdings as well as on the ongoing management of lands that may ultimately be used by other company divisions. Principal products of this segment are pine pulpwood and timber products. A significant portion of the wood harvested by JOE is sold under an agreement expiring in June 2012. About 284,000 acres were encumbered by this agreement as of year-end 2004.

The Alfred I. duPont Testamentary Trust sold an aggregate of 18 million JOE common shares to the public during 2004, decreasing its ownership of JOE common stock to 7.5% at year end 2004.

Per Share Data (\$)

(Year Ended December 31)	2005	2004	2003	2002	2001	2000	1999	1998	1997	1996
Tangible Bk. Val.	5.42	5.22	5.27	5.59	4.71	5.14	9.28	8.52	9.89	13.08
Cash Flow	2.03	1.56	54.58	2.30	1.18	1.75	1.43	0.70	0.74	1.32
Earnings	1.50	1.11	0.98	1.85	0.83	1.15	0.88	0.28	0.38	1.00
S&P Core Earnings	1.39	0.98	0.96	1.64	0.51	NA	NA	NA	NA	NA
Dividends	0.60	0.52	0.32	0.08	0.08	0.08	0.02	0.08	3.74	0.07
Payout Ratio	40%	47%	33%	4%	10%	7%	2%	29%	NM	7%
Prices - High	85.25	64.75	38.60	33.74	29.75	31.37	28.56	37.00	38.50	23.16
- Low	58.50	35.06	26.19	24.35	20.90	17.68	20.06	18.50	21.06	17.87
P/E Ratio - High	57	58	39	18	36	27	32	NM	NM	23
- Low	39	32	27	13	25	15	23	NM	NM	18

Income Statement Analysis (Million \$)

Revs.	938	952	761	646	868	881	750	392	346	431
Oper. Inc.	219	182	176	145	147	217	194	99	85.3	177
Depr.	38.1	35.1	31.5	23.8	29.6	51.8	49.4	38.9	32.5	28.7
Int. Exp.	15.2	12.9	12.5	17.0	18.1	12.4	Nil	Nil	0.39	0.60
Pretax Inc.	186	141	119	242	113	167	121	81.4	94.4	189
Eff. Tax Rate	34.6%	37.8%	35.8%	37.0%	37.4%	33.9%	19.8%	44.4%	42.9%	43.9%
Net Inc.	114	85.1	75.9	151	70.2	100	77.6	26.1	35.5	91.9
S&P Core Earnings	105	74.2	73.5	132	43.0	NA	NA	NA	NA	NA

Balance Sheet & Other Fin. Data (Million \$)

Cash	203	94.8	57.4	73.3	182	173	141	240	159	537
Curr. Assets	NA	NA	NA	NA	NA	141	197	167	302	631
Total Assets	1,592	1,404	1,276	1,170	1,341	1,115	1,822	1,604	1,547	1,806
Curr. Liab.	NA	NA	NA	NA	NA	114	132	93.4	50.7	56.9
LT Debt	554	146	306	319	104	264	116	9.95	Nil	Nil
Common Equity	489	495	487	480	518	569	941	883	907	1,197
Total Cap.	1,378	652	1,033	1,017	838	991	1,673	1,499	1,481	1,731
Cap. Exp.	19.9	9.96	6.91	16.7	15.1	136	45.7	135	66.6	64.2
Cash Flow	152	120	107	175	100	152	127	65.0	68.0	121
Curr. Ratio	NA	NA	NA	NA	NA	1.2	1.5	1.8	6.0	11.1
% LT Debt of Cap.	40.2	22.4	29.6	31.4	12.4	26.6	6.9	0.7	Nil	Nil
% Net Inc. of Revs.	12.1	8.9	10.0	23.4	8.1	11.4	10.3	6.7	10.2	21.3
% Ret. on Assets	7.6	6.4	6.2	12.0	5.7	6.8	4.5	1.7	2.1	5.5
% Ret. on Equity	23.2	17.3	15.7	30.3	12.9	13.3	8.5	2.9	3.4	8.3

Data as orig reptd.; bef. results of disc opers/spec. items. Per share data adj. for stk. divs.; EPS diluted. E-Estimated. NA-Not Available. NM-Not Meaningful. NR-Not Ranked. UR-Under Review.

Office—245 Riverside Ave Ste 500, Jacksonville, FL 32202-4927. Telephone—904-301-4200. Email—info@joe.com Website—http://www.joe.com Chrmn & CEO—P. S. Rummell. Pres & COO—K. M. Twomey. CFO—A. M. Corriggio. Investor Contact—B. Slappey 904-301-4302. Dirs—M. L. Ainslie, H. M. Durden, T. A. Fanning, H. H. Frampton, III, A. W. Herbert, Jr., D. M. Kesler, J. S. Lord, W. L. Revelle, P. S. Rummell, W. H. Walton, III. Founded—in 1936. Domicile—Florida. Empl—1,362. S&P Analyst: N. J. DeVita/AE



DEPARTMENT OF THE AIR FORCE
AIR EDUCATION AND TRAINING COMMAND

3 SEP 2002

Brig Gen Larry D. New
Commander, 325th Fighter Wing
445 Suwannee Road, Ste 101
Tyndall AFB FL 32403-5541

Mr. Randy Curtis
Executive Director
Panama City-Bay County International Airport
3173 Airport Road, Box A
Panama City FL 32405

Dear Mr. Curtis

In response to your letter, Tyndall Air Force Base is aware that the Panama City-Bay County International Airport (PFN) Environmental Impact Statement will assess at least three alternatives for the Panama City airport to include an expansion of the existing airport facilities, relocation of the airport to a site in the West Bay area, or take no action. While we do not engage in local decision-making, we appreciate the opportunity to provide the impact of these alternatives to Tyndall's mission.

The primary mission at Tyndall is to train F-15 (and soon, F-22) fighter pilots for combat. In order to do so safely and effectively, we need to be able to safely operate in our local airspace and training ranges with a minimum of conflict with other air traffic. The current special use airspace restriction requires civil aircraft arriving or departing PFN to the north to utilize the VFR Flyway. Aircraft arriving or departing from PFN to the south must avoid the Tyndall Terminal Restricted Area. Additionally, aircraft approaching Tyndall AFB from the north often infiltrate PFN's Class D airspace. While the two airports have adjusted to these issues and work them safely on a daily basis, it is not a desirable situation to have commercial aircraft and high performance fighter aircraft in this close proximity.

There currently exists only a 9-nautical mile separation between Runway 13-Tyndall AFB, and Runway 14-PFN. Whatever decision is made concerning future PFN operations, our concern is that it should consider the de-confliction of Tyndall military operations with civil aircraft operations. Expanding the existing PFN facilities would present unique challenges and lead to greater conflict with Tyndall AFB operations, assuming the expansion would attract more commercial air carriers and large frame aircraft.

A relocation of the airport to the West Bay area would facilitate the de-confliction of the respective airfields. Considering the factors discussed, of the alternatives being assessed

by the EIS, the relocation of PFN to the West Bay area over the other two alternatives has less adverse impact on Tyndall operations.

Tyndall AFB is committed to strengthening our relationship with local communities and governments, and working closely with county and community planners, government leaders, developers and concerned citizens. We appreciate the opportunity to provide our view on issues that could impact the mission of Tyndall AFB.

Sincerely

Larry D. New
LARRY D. NEW
Brigadier General, USAF
Commander

Panama City - Bay County International Airport Environmental Impact Statement

Public Comments and Responses

Carl D. Peterson
1049 Individual Letter

1-5-1 I find it to be a rather diabolical situation with the Airport Sponsor recommending a relocation move when their commercial airline flights have dropped by 50% to 12 aircraft since May 2001. Air freight has fallen by nearly 29% in the past year. Airmail has dropped from 1,788,438lbs in 2000 to virtually zero in 2004. Two airlines departed PFN; and, the traveling [sic] public has lost two major hub destinations. While PFN gained a scheduled flight to Orlando, the loss of Tampa and Dallas Fort Worth leaves PFN with our two traditional destinations, Atlanta and Memphis.

Response Updated information regarding aviation activity at PFN is included in Chapter 1 of the FEIS. Aviation demand forecasts are developed to represent overall trends in aviation activity—passenger and cargo enplanements and aircraft operations. Activity during a particular year may be above or below the forecast activity, based on specific short-term occurrences, such as the loss of service by a particular carrier. Despite these fluctuations, the FAA believes that the TAF remains a valid forecast for the basis of this EIS and that the Airport Sponsor's forecast provides the basis for assessing the full range of potential environmental effects associated with the Proposed Project and the alternatives.

Peterson Response to Your Response: Your response contains the usual glittering generalities and cracker barrel philosophy. It's nearly 5 years since 911. What evidence can you provide to prove your thesis that the TAF remains valid. What overall trends are you referring to that leads you to believe all will be well and a booming aviation market will greet PFN's new airport by 2010/2011? I don't believe the Airlines \$35 billion in losses since 911, withdrawal of 722 aircraft from service by seven legacy airlines and the layoff of 88,000 employees including 10,000 pilots and 12 or more airline bankruptcies including liquidations doesn't, after 5 years, appear to me to be "short-term occurrences" as you the FAA puts it. What evidence does the FAA have to classify the above as "short term occurrences?"

5-5-2 Additionally, the Airport Sponsor's original feasibility study covering the future revenue and expenditure forecasts from 2000 through 2006 have been over optimistic to say the least. The revenue earned from 2000 through 2004 fell short of the \$16,704,430 by \$2,666,817, expenditures exceeded the forecast of \$11,787,978 by \$3,821,229. The delta comes to \$6,488,046. Hardly chump change in anybody's books.

The only thing keeping this relocation effort alive is the \$22,730,517 "welfare check" commitment provided by the State of Florida through the Transportation Outreach Program established by the legislature.

Now the Airport Sponsor has \$9.4 million welfare check request, included in their current budget that has yet to be appropriated. We're looking at \$32.1 million in Florida tax/welfare dollars used to subsidize this proposal.

Response Comment noted.

Peterson Response to Your Response: Just what does "Comment noted" mean? The PFN Airport Authority has gone through \$33 million to date and have another \$45 million in their war chest. That brings the total available cash spent and to spend to \$77 million. The PFN total of this amount is about \$394,000. Is this another short term occurrence? They do real well spending other people's money and have yet to get approval for this project.

2-5-3 If the forecast indicated a need for only a 6,800ft runway until such time as demand deemed otherwise why was the Airport Sponsor allowed to spend most of the study time concentrating on a "full build-out to 8400ft?

Response The 8,400' runway is analyzed in the FEIS because it is the Airport Sponsor's proposed project. The 6,800' runway length is also analyzed in the FEIS.

Peterson Response to Your Response: I realize both runway lengths are analyzed in the study. The question is will there be a full build out to 8400ft or will the FAA go with funding 6800 ft with PFN looking at the State of Florida for funding the added 1600ft of runway? When will a final decision be made?

35

5-5-4 What does "Independent cost estimates are required in advance of negotiating fees for any professional services" mean to the layman?

Response The FAA requires that airport sponsors have a cost estimate prepared for a scope of services by a professional not affiliated with the proposed contractor. The independent cost estimate is conducted by a professional qualified to assess the level of effort required to complete the scope of services.

Peterson Response to Your Response: Does the FAA have a list of acceptable professional specialists. How do we Florida taxpayers know if the "professional" chosen is qualified, eminently qualified, or an also ran *Independent!!!* The fiasco over the handling of the Task 5A & 5B proposal regarding when the work was done, when the proposal was submitted and subsequently funded should be of concern to all. Who has misinformed the public on this proposal and what is going to be done about it?

36

1-5-5 Why weren't the assumptions that Southwest will serve PFN by 2010 explained as requested?

Response Aviation forecasts are prepared based on anticipated demand and are not airline specific unless specific airline commitments have been documented.

Peterson Response to Your Response: Your response avoids the issue. In your FAA letter dated 19August 2000 to the PFN Airport Director , in your attachment you specifically asked; "One of the study's assumptions is that Southwest will serve Panama City-Bay County International Airport(PFN) by 2010. Please explain the basis of this assumption." My question and yours went unanswered. To me that is slipshod staff work. The question is still valid and such a vision in this day and under the current commercial aviation environment is, in my opinion, a dream gone wild. Why did your staff fail to get a response?

37

5-5-6 Did the Feasibility Study answer your question how PFN would attract a larger share of traffic from the Southeast United States? I didn't find a satisfactory answer.

Response This comment is outside of the scope of the EIS. Any questions regarding the *Feasibility Study* should be directed to the Airport Sponsor.

Peterson Response to Your Response: This question was raised in the same FAA letter cited above. You directed the question to the sponsor; "Another assumption is that PFN would attract a larger share of traffic from beyond the Southeast United States. Please elaborate." I assume from your response to my question, it went unanswered and then Acting Manager, John W. Reynolds, was stiffed by PFN's Mr. Curtis to whom the letter was addressed.

38

1-5-7 I did not read anything in the Feasibility Study or the DEIS that satisfactorily explained the parameters, other than cost savings, airlines would consider in moving larger aircraft into the PFN market. If I missed something, please give me a reference. Alternatively, did the Airport Sponsor ignore the guidance?

Response Aviation forecasts are prepared based on anticipated demand and are not airline specific unless specific airline commitments have been documented. The forecasts include a review of enplaned passengers and potential markets, and the size of potential aircrafts that would serve these markets. It is not within the scope of the EIS to predict airline responses to demand.

Peterson Response to Your Response: Those are all good buzz words for the public but not for this writer. The Feasibility Study and its forecasts were invalidated by 911 and I have been unable to locate a forecast since then that reflects the steep drop in commercial airline aircraft availability- Here it is a drop of 52%, the loss of two major destinations, and a not too competitive airfare structure. When is the last time the FAA reviewed enplanements, the potential market for PFN, and potential size of aircraft? I used to fly out of PFN in DC-9s and B727s. Now its RJs when I fly. Of the total number of airline operations in May 2006, air taxis accounted for 991 of the 1313 operations. That is 75% of airline operations How then does the PFN anticipated demand reach the equivalent of the pre 911 25 commercial airline flights per day without regard to specific airlines and type commercial aircraft assuming current load factors ?

39

40

5-1-8 Finally, in closing, let me say that I was deeply disappointed by the attempts of FAA personnel to inhibit free speech at a Public Hearing.

Response All attendees were given the opportunity to provide verbal or written comment at the public hearing on the DEIS.

5-1-9 The attempts to stifle contractor's conversations with the public and those who wished to video record the Public Hearing proceedings was uncalled for; and, in my opinion, in violation of every American's right to free speech.

Response A public workshop was conducted to provide background information to the general public prior to the public hearing and was not part of the official public hearing. Contractors were present at the workshop to provide information regarding specific technical analyses but not to provide official comment on behalf of the FAA.

The purpose of the public hearing was to obtain input from the public to which the FAA would prepare formal responses. These responses are documented in the FEIS.

Peterson Response to 5-1-8 and 5-1-9: I attended the meeting, the public hearing and gave a presentation. Specifically, I'm referring to trying to stop me from talking to the consultants present.

41

1-5-10 The Airport Sponsor's contractor for the updated forecast is HNTB Corp. The Bibliography does not provide the company's address. A check with Bell South could not be made for a telephone number because I did not know the city in which the company is located. Further, In a 1December 2004 letter to Mr. Dean Stringer, FAA Orlando District Office, I requested verification that a January 2004 study had been made and asked for a copy or direct the PFN Airport Authority to provide a copy. Mr. Stringer has yet to respond to either request. How can the public verify data, make official inquires and examine and make comments regarding The Sponsor's forecast if the forecast is not made available to the public and determine if the data developed in the forecast is misleading to the concerned public.

Response It is FAA's understanding that the updated forecast has been made available by the Airport Sponsor for public review.

Peterson Response to Your Response: The point is your office obviously doesn't delegate staff work in order to respond to public requests for information, studies, etc. "It is FAA's understanding that the updated forecast has been made available" That doesn't speak well for FAA staff work. If you knew, you should have directed the individual to the agency and a point of contact since, in my case, I did not and still do not know the peculiarities of the FAA administrative system

42

3-1-11 The Sponsor did not make an official inquiry to Hq USAF to determine if joint use of Tyndall AFB would be acceptable or unacceptable. No documentation has been made available to refute this statement.

Response See the October 7, 2003 letter to Brigadier General New, included in Appendix D.

Peterson Response to Your Response: I have read the PFN 6June 2003 letter to B/G New on Joint Use and moving the entire PFN operation to Tyndall AFB. And Ms. Lane's letter of 7October 2003 indicating that PFN had no intention of applying for joint use with TAFB

Hq. USAF is the approving authority for joint use. AFI 10-1002 par 1.2 Agreements for Civil use of Air Force Airfields covers joint use. Mr. Tim Bennet, Chief Civil and Foreign Government Affairs, Directorate of Operations and Training, Hq. USAF noted in a 15Sept 2003 e-mail: "Generally, the Air Force is willing to consider joint use at an airfield if it does not have pilot training, nuclear storage, or has a primary mission that requires a high level of security. We have interpreted that *pilot training* to mean Undergraduate Pilot Training and not follow on crew training. The key is "generally" and "will consider."

The Sponsor failed consider or ask the Department of the Air Force for joint use that could be similar to Eglin AFB (a two airport operation) which is the home of Okaloosa Regional Airport, two satellite fields and a private airport 4 miles south of Eglin AFB and home to a F-15 Fighter Wing and selected for the A35 Strike Fighter program in the future. Talk about busy, Eglin has a corner on the market while Tyndall languishes in a five day work week. The key is no one considered a split operation and subsequently no one asked the Air Force for consideration of such a concept.

This is further self evident when you read the 13June 2003. Subject: CORDINATION MEETING WITH UNITED STATES AIR FORCE REPRESENTATIVES REGARDING THE EIS FOR A REPLACEMENT AIRPORT FOR PANAMACITY-BAY COUNTY, FLORIDA in which it was noted "There was little discussion regarding joint use of Tyndall AFB for military and civilian aircraft operations." The "new tactical" fighter was brought up once again and the training base was used as an excuse. Just think Eglin will have the A35 Strike Fighter Program plus a joint use commercial/military airport with a fighter wing, weapons testing, two satellite bases and a private airport 4 miles south. It is evident that Sponsor was not interested in a joint use base for commercial air operations and the current PFN for General Aviation operations. Having flown 9 different Jet fighters and 2 Jet Trainers and the venerable T-39, I find these arguments weak and without merit. It goes back to the relocation being a land deal not an airport deal.

The PFN 6June 2003 letter, mailed three years after the relocation effort started in 2000 is more than likely a cover in order to fill a square to avoid being questioned at a later date. The real culprit is illustrated as follows:

As Peter Rummell, Chairmen & CEO of St Joe Company so aptly put it in a letter to Mr. Donald Crisp, Chairman: Panama City - Bay County Airport and Industrial District on 17 November 1999.

"First, let me commend you and your Board for your vision and leadership. The St Joe Company strongly supports to enhance the air service in Northwest Florida"

"The bridge to our bright future is dependent, in so many ways, on the development of a truly regional commercial and industrial service airport."

"It is becoming more and more clear that a replacement airport is a necessity. Doing nothing is not an option".

"Therefore, we intend to support this effort appropriately and look forward to working with you to define a successful strategy that will become a source of pride for all of Bay County and Northwest Florida."

“While we understand that the location of the site has not been determined our propose action is contingent upon the site being located in West Bay County generally in the 12 mile area along County Road 388 between St Route 79 and St Route 77.

So!! Don't tell me that anything but relocation was an option in light of these two gentleman's alliance. Has the FAA been snookered or did you know about this all the time?

1-5-12 It is interesting to note, having traveled extensively in the 1980s & 1990's, that DC-9s and B727's were in use at the time of this growth and were phased out over time in favor of what I call "The stocking stuffer" the small regional jet and turbo prop passenger carrying aircraft; and, beginning with September 2001 a phase out of commercial flights to where we are now down to 12 aircraft per day. Insuring higher passenger capacity per aircraft makes sense in a market plagued with high fuel costs, profit squeeze, over capacity in the commercial airline industry, excessive and crippling debt loads, and competition from the low cost carriers who are hammering the legacy carriers. This also may account for the drop in the number of flights arriving/departing from PFN that reached only 12/day on 9 January 2005

Response The aviation demand forecasts used for analyses in this EIS reflect current and anticipated airline industry trends, including the aircraft fleet and load factors.

Peterson Response to Your Response: What is the source of your aviation forecasts; and, what are their forecasts that shows a turn around in the commercial airline business to the extent that the FAA & the State of Florida should spend \$300 to \$400 million to move the current PFN operation because of its alleged inadequacies. Your response is one for all occasions and provides no definitive documented forecasts to support the relocation. I call it poor staff work. Give us some specifics with supporting rationale NOT BUZZWORDS

2-1-13 If runway 14-32 were closed over an extended period of time this may be a problem. The same could be said for the proposed airport relocation. The proposed site precludes an instrument approach from west to east due to the Restricted Air Space, R2914A, and may preclude a safe missed approach by a commercial aircraft of the hoped for size, but unlikely, of international charter flights. I haven't been able to locate a chart with instrument approach procedures for the proposed airport other than the primary runway. This is a false premise for relocation. Other than a 6800 ft runway, the proposed design and location is inferior to the existing airport facility.

Response Restricted Area R-2914 would preclude a west to east approach. There is enough airspace to the south and east to accommodate missed approach procedures when they are developed.

Peterson Response to Your Response. I have been told that the aforementioned Restricted Airspace is a corridor for high speed low level combat crew training and that radar coverage is unreliable in that area below 1500 ft. TYN is scheduled to get a digital radar and when installed it is their intention to tie into several smaller digital radars to improve coverage .I do not believe it has been discussed but the Eglin restricted areas adjacent to the proposed relocation site used for bombing , missile impact areas, and fighter aircrews combat training. Has a flying safety evaluation been completed covering the various situations that could lead to accidents as a result of civilian aircraft straying into USAF restricted areas adjacent to the proposed relocation site? Who is supposed to be the OPR on this issue? Do you have any official military correspondence from appropriate Eglin AFB military command authorities concurring or nonconcurring in the relocation site vis a vis their ranges?

1-2-14 Are there cargo facilities on airport property that belong to tenant cargo operators? Located off airport property, what's the problem? What type cargo needs security guards, convoy escort, if any, Does the amount of freight brought in and shipped out need temporary storage? If so, How much and how often?

Response There are no cargo facilities on airport property that belong to tenant cargo operators. There is no current need for temporary storage.

Peterson Response to Your Response: The Cargo business other than UPS, FEDEX and other night haulers is miniscule and has no impact on the economy anywhere near equivalent to our seaport

47

1-3-15 What does Eglin traffic have to do with PFN air operations? Okaloosa Regional Airport is located within a Special Air Traffic Area (See FAR Part 93 for details). Pensacola Regional Airport is located within a MOA(A292) and adjacent to a Caution Area which states: "Caution; High speed military aircraft operating from surface to 4200 ft within a five nautical mile radius of Pensacola NAS" This puts PNS within 4 to 5 miles of a high speed caution area. All areas have radar coverage and flight following. PFN has no where near such airspace constraints nor does Tyndall AFB.

Specifically, what is the problem: flight following by enroute traffic control, approach control, departure/arrival control, the control tower or aircraft not following instructions? Further, throughout the report, The Sponsor has failed to clearly identify the various sub categories of Special Use Airspace (SUA) such as Military Operations Area (MOA), Restricted Area, Warning Area, Air Traffic Control Assigned Airspace (ATCAA) and Military Training Routes (MTRs) both VFR and IFR and Airspace Classification such as Class A, B, C, D, E, G etc. The above description is misleading and incomplete and should be rewritten to describe air operations as used within the subsets of an SUA. One size does not fit all!

Response The FAA has coordinated with USAF representatives throughout the EIS process. There have been no indications in meetings or written correspondence from Tyndall RAPCON of a radar coverage problem at the proposed site. Airport development at the current location or at another location would require further coordination and planning with the USAF. Moreover, irrespective of the airport's location, the FAA would require the Airport Sponsor to provide the appropriate air navigation and air traffic control facilities to ensure the efficient and safe operation of the airport. Section 1.5 and 3.3.1 provide a description of existing conditions. No problem with Eglin traffic is stated in these sections.

See Appendix B for a description of airspace issues associated with the Panama City-Bay County region.

Peterson Response to Your Response. My contact is 325OSS/DOAS. Since the meetings were held three years ago, June 12 2003, one would think the FAA knows by now if the Airport Sponsor will have to provide The NAVAIDS discussed above. *Nothing like waiting for a Record of Decision to determine a NAVAID is required or not required. What would be the approximate cost? I do not believe it is in the current airport relocation cost plan and who pays for it? Does the FAA require radar calibration analysis of the optional sites selected for PFN's relocation? Were any accomplished by the 325th FW to establish a credible flying safety operational environment?*

48

1-5-16 Dothan isn't a major player in this scenario but Tallahassee is. They may have lost AirTran but gained Continental Airlines and a major destination in Houston that opens up the South American markets. Any comparison that excludes Tallahassee's impact on PFN is incomplete and misleading.

Response Please see Section 3.4.3 for a discussion of Tallahassee Regional Airport.

Peterson Response to Your Response: I did.

1-5-17 Both Tallahassee and Pensacola Regional Airports have been forecast by the Boyd Group, Aviation Consulting and Forecasting, to be in the "Top Growth Airports 2000-2010 with Tallahassee at 8th with 698,000 enplanements [sic] and Pensacola at 4th with 930,000 enplanements. Recall Pensacola Regional is in an MOA and adjacent to a high speed caution area used by the Blue Angels. Panama City etal. Is not on the radar screen in the Boyd Group forecast.

Response Comment noted.

Peterson Response to Your Response: I guess with "Comment Noted" that neither of the two other airports cited above have any airspace problems, particularly Pensacola, or you would have inserted an appropriate response. I guess the same goes for Eglin AFB as well. The only one crying in their

49

beer is the Sponsor who those 12 commercial flights per day are a dangerous threat to Tyndall AFB operational units.

1-5-18 This use of alternate "Updated Forecasts" prepared by The Sponsor are [sic] aimed at which decision-making organization? If the FAA TAF is to be the primary for PFN, why the alternatives?

Response Aviation demand forecasts are developed to represent overall trends in aviation activity—passenger and cargo enplanements and aircraft operations. Activity during a particular year may be above or below the forecast activity, based on specific short-term occurrences, such as the loss of service by a particular carrier. Despite these fluctuations, the FAA believes that the TAF remains a valid forecast for the basis of this EIS and that the Airport Sponsor's forecast provides the basis for assessing the full range of potential environmental effects associated with the Proposed Project and the alternatives.

Peterson Response to Your Response: I agree that the FAA forecast is a far better tool than one provided by the Sponsor known to us "po folks" such as the Fishkind Report. It bore no resemblance to the real world of commercial aviation past, present or future.

1-5-19 If the events of 11 September 2001 did not effect enplanements at PFN, it sure affected the commercial airlines use of aircraft. From May 2001 to 9 Jan 2005, the number of aircraft used to transport the passengers cited above has been reduced from 24 to 12. The loss of Dallas-Fort Worth and Tampa plus six flights /day by USAIR will have an impact on future enplanements. Figures don't lie but liars figure, PFN's enplanements according to the FAA's report for 2003 ranked PFN as 18th of 20 airports in Florida with 182, 027 [sic] boarding passengers. This was .32% of the total of Florida's 56,622,312 enplanements and .003% of the U. S. total of 651,728,887 enplanements. Florida's top six airports accounted for 88.04% of Florida's 2003 enplanements; and the next four airports bring the total to 95.62%. Pensacola is ranked 9th and TLH is ranked 11th. PFN has fewer commercial aircraft flying at an increased capacity and, perhaps, profitably.

Response Following the events of September 11, 2001 there was a nationwide reduction in air travel; however, recent trends indicate that air traffic is recovering as documented for PFN in Section 1.7 of the FEIS. As stated in Section 1.7.1.1, the percentage reduction in air traffic after September 11, 2001 at PFN was less than the percentage reduction over the nation as a whole.

Peterson Response to Your Response: PFN suffered its first major losses in January 2005 with the withdrawal of USAIR and the loss of Tampa and Dallas Fort Worth as major destinations.. While airline operations in 2006 are up 10.99%, enplanements are down 8.96 % and deplanements are down 9.25% for an overall average of -9.11%. What concerns me is the forecast in the Feasibility Study hasn't been met and was used as the basis for the relocation in the first place. Shouldn't the Sponsor be required to amend their Feasibility Study forecast or is considered history? Maybe they shouldn't, There is an Old Air Force saying, "Figures don't lie but liars figure." That's been the Sponsors concept.

1-5-20 PFN's "consistency" has been reduced to 12 aircraft/day and that is as close to the bottom as The Sponsor can get. In May 2001 PFN had 100% more commercial aircraft arriving/ departing then today. The Airlines Operations count will fall, with the loss of USAIR and SkyWest, from the 2004 count of 17,709 total operations. The sponsor should provide a projection of an estimated operations count to validate the statistical evidence of growth and identify where it will come from.

Response Aviation demand forecasts are developed to represent overall trends in aviation activity—passenger and cargo enplanements and aircraft operations. Activity during a particular year may be above or below the forecast activity, based on specific short-term occurrences, such as the loss of service by a particular carrier. Despite these fluctuations, the FAA believes that the TAF remains a valid forecast for the basis of this EIS and that the Airport Sponsor's forecast provides the basis for assessing the full range of potential environmental effects associated with the Proposed Project and the alternatives.

Peterson's Response to Your Response: As my mother in law used to say "Same old sixes and sevens." A speech for all occasions with no factual data to back it up. Another song and dance.

52

1-5-21 The forecast cited above was not made available to the general public until 7 January 2005, a year after it was published, and only after a member of the public heard about it as a rumor and asked for it. .. My request to the FAA on 1 December 2004 for the document in question went unanswered.. There have been a number of forecasts made that have increased the Terminal Area Forecast for PFN since the inception of the airport relocation project that have been dismissed by the FAA. *The Panama City - Bay County International Airport, Task 2 Feasibility and Site Selection Study, Element 2-1,3: Development 2005, 2010 and 2020 Forecast* detailed the techniques to be used. Later came the *Fishkind Report with astronomical enplanement forecasts*. Since the FAA repudiated the aforementioned forecasts and all terminal area forecasts and retained the FAA TAFs for PFN as the primary forecast instrument, conservative or otherwise, In a 13 November 2003 e-mail Ms Lane Noted, "All Analysis done to date for the EIS is based on the FAA's Terminal Area Forecast for the Airport." SO! What is the purpose of the inflated forecasts developed by HNTB Corp.

Response Airport sponsors develop aviation forecasts as part of master planning efforts. Subsequent to the November 13, 2003 e-mail, the Airport Sponsor prepared separate forecasts, and the FAA determined that the EIS should use both the TAF and the Airport Sponsor's forecasts in the EIS analyses.

Peterson Response to Your Response: The FAA would have been better off using their TAF and not used the Sponsors at all. Yours is more trustworthy. I agree with Ms Lane's decision too use the FAA TAF.

53

1-5-22 It should be noted that the "buzz words" used above such as "potential", "Potential for transatlantic service", "several factors could affect" "Other factors could affect" are not supported by data to validate the enplanements as noted above. What you have are excellent "word merchants" that avoid factual justification. Further, The Sponsor should make a solid case for a larger airport and avoid "what ifs" or admit that there is no justification for relocation based on facts not platitudes to justify their forecasts.

Response The FAA believes that the TAF remains a valid forecast for the basis of this EIS and that the Airport Sponsor's forecast provides the basis for assessing the full range of potential environmental effects associated with the Proposed Project and the alternatives.

Petersons Response to Your Response: Nothing but buzz words. How does the Sponsor's erroneous forecasts help the FAA measure "the full range of potential environmental effects" associated with the project? It's the equivalent of forecasting a hurricane in December. Does this include the manner in which the Sponsor envisions the use of the current airport upon resale? It appears to me to be an environmental nightmare with serious consequences for the St Andrew Bay's biodiversity.

54

1-5-23 To the contrary, the results of the 11 September 2001 terrorist attack that resulted in a substantial reduction in the commercial aviation aircraft inventory with some 800 aircraft put in storage of which 670 were by the top five carriers is hardly mentioned. The bankruptcy of some seven air carriers, the Airline Transport Association's estimated that 2,200 commercial airline flights were cut in 2003 in addition to those flights cancelled following 911, the financial plight of such carriers as Delta, American, USAIR and Northwest Airlines and certain LCCS is not noted. The reduction in nationwide air travel from 703 million in 2000 to 651 million in 2003 is ignored as well.

Response Following the events of September 11, 2001 there was a nationwide reduction in air travel; however, recent trends indicate that air traffic is recovering as documented for PFN in Section 1.7 of the FEIS.

Peterson Response to Your Response: Give me a break. See my response to 1-5-19. The impact on PFN is going against the grain of "recent trends" as the FAA describes it.

55

1-5-24 Further the decline in commercial air operations at PFN from 24 commercial aircraft/day in May 2001 to 12 per day effective 9 January 2005 with the loss of USAIR was not considered. The loss of two major destinations, Tampa and Dallas-Fort Worth, has reduced the options for the travelling [sic] public from PFN. The real trend of PFNs aircraft boardings is slower growth, more likely a loss in enplanements and keep PFN in 18th of 20 Florida airports in terms of aircraft boardings only besting Gainesville and Naples. That hardly gives PFN bragging rights.

Response Aviation demand forecasts are developed to represent overall trends in aviation activity—passenger and cargo enplanements and aircraft operations. Activity during a particular year may be above or below the forecast activity, based on specific short-term occurrences, such as the loss of service by a particular carrier. Despite these fluctuations, the FAA believes that the TAF remains a valid forecast for the basis of this EIS and that the Airport Sponsor's forecast provides the basis for assessing the full range of potential environmental effects associated with the Proposed Project and the alternatives.

Peterson Response to Your Response: How can you call a 52% loss of commercial airline flights a short term specific occurrence? When does the Sponsor forecast a return from 12 flights per day to the pre 911 25 flights per day? Current passenger counts are off 9.11% through May 2006. Is that a specific occurrence or a long term trend? Please define the difference of a specific occurrence and along term trend. The downtrend at PFN began in small numbers but has picked up speed since January 2005.

56

1-5-25 Commercial air operations growth as forecast above like enplanements does not reflect the changes as cited above which could cut commercial air operations from the 17,759 in 2001 to 10,000 or less if increased passenger service by commercial air carriers does not develop. The Sponsor should detail how the above enplanements and operations were developed and what/whose planning factors were used to develop such exponential growth in the face of a depressed commercial air carrier market. The current depressed market condition is due to high operating costs, over capacity, and, with a number [sic] airlines on the verge of or in bankruptcy or liquidation. These airlines are searching for routes that will be profitable immediately or subsidized by the US Govt. or local community businesses financial support. The Sponsor should develop a marketing or strategic plan that will at the very least get PFN back to 2001's operational activities before reaching for the sky as if 911 didn't occur.

Response Operation and enplanement data for calendar year 2004 has been added to Tables 1-1 and 1-2 in the FEIS.

Peterson Response to your Response: Thank You

5-5-26 How compatible is the Sponsors submission to the FAA/Mitre Corporation study titled: *Capacity Needs in the National Airspace System An Analysis of Airport and Metropolitan Area Demand and Operational Capacity in the Future*. This study is hailed by the FAA as a new approach to assessing needs for airport capacity. This study looks at population trends, economic and societal shifts and the changing dynamics of the airline industry. The study looks at comparative data including infrastructure improvements at US commercial airports and projects where future capacity limitations/ constraints will occur. The study recognizes major changes that affect the future prior to 9-11 but also takes in consideration what has accelerated since 9-11 travelers changing their travelling habits, demand for low fare service and it growing strength, the impact of Internet "shopping" and price transparency, fractional ownership and smaller aircraft's promise of greater schedule and destination choices. There are other features worth mentioning; however, for expediency it is safe to say that the study's focus on the top 35 airports was expanded to 291 commercial service airports across the US including 223 metropolitan areas. To date, July 2004, the possible new airports were identified for Las Vegas NV, Chicago, IL and a possible replacement airport for San Diego CA. The study goes into great detail in covering the next two decades with the predominant trend toward being expansion of existing airports to meet forecast demands and long lead time items for complex runway systems.

The questions arise:

- Where does PFN fit in the FAA picture?

- Why doesn't the FAA use their study format for analysis as a standard system for all studies instead of a myriad of analytical models that favor The Sponsor?
- Was PFN considered in the study cited above?
- If the FAA must manage its budget like every government agency, why does it allow The Sponsor to use nonstandard formats for analysis?
- Since the study indicates the new Future Airport Capacity Task (FACT) used in the aforementioned study is to bring all studies together in order to develop a "common list" of airports that may need additional capacity, why isn't FACT a requirement for the PFN relocation project even if its classified as a "Small Non Hub Airport?"
- Why couldn't PFN be an early candidate as non Operational Evaluation Plan airport to test the system on capabilities and limitations and give detail feedback to upgrade future iterations?
- Wouldn't this approach give the FAA a methodology to better manage their budget?

Response PFN is not a capacity constrained airport and is not referenced in the FAA's 2004 capacity study. The purpose of the MITRE study was to look at delay at large service airports. Capacity is not the purpose and need of the proposed project and is not the subject of the EIS.

Peterson Response to Your Response. If capacity is not the purpose and need of the proposed project, What is? Certainly if the airport doesn't have a capacity problem with passenger enplanements / deplanements and is capable of accommodating a B757 (the Vice President of the United States), C130 and C141 as far as airlift capacity and need is concerned then what other purpose and need is there? Please explain.

} 57

- 5-5-27** Finally, the DEIS Nor The Sponsors have failed, miserably, to recognize the economic impact of 11 September 2001 on the commercial airline industry and the traveling [sic] public. For example:
- Some 800 aircraft were initially withdrawn from service with the top five airlines taking 670 aircraft out of service.
 - * Industry employment dropped from 442,800 to 354,000 workers in the airline industry and is still dropping to this day.
 - The industry has lost some \$30 billion from 2001 through 2004 using an estimate of \$6 billion for 2004.
 - Six airlines are in bankruptcy and some have been liquidated
 - Purchasing of new aircraft has been deferred or cancelled.
 - The Airline Transportation Association estimated that 2,200 flights were cancelled in 2002.
 - US airways has withdrawn from PFN, VPS and PNS
 - Delta has retrenched, imposed draconian pay cuts on its employees, revamped its flying schedules, cut it
 - * Dallas/Fort Worth Hub from 253 flights to 23 and eliminated A PFN travel destination. Further, Delta's financial losses in 2004 area record for any commercial airline.
 - Commercial air boardings dropped from 703 million in 1999 to 648 million in 2002 and crept up to 651,728,887 in 2003, while increasing, the count is far from its peak air travel year. We will need over 51 million boarding passengers to reach the 1999 record.
 - The public and local, state, and federal government is owed solid substantive justification and not the fantasies and glittering generalities provided by The Sponsors.

Response Aviation demand forecasts are developed to represent overall trends in aviation activity— passenger and cargo enplanements and aircraft operations. Activity during a particular year may be above or below the forecast activity, based on specific short-term occurrences, such as the loss of service by a particular carrier. Despite these fluctuations, the FAA believes that the TAF remains a valid forecast for the basis of this EIS and that the Airport Sponsor's forecast provides the basis for assessing the full range of potential environmental effects associated with the Proposed Project and the alternatives. Aviation forecasts are prepared based on anticipated demand and is not airline specific unless specific airline commitments have been documented. The forecasts include a review of enplaned passengers and potential markets, and the size of potential aircrafts that would serve these markets. It is not within the scope of the EIS to predict airline responses to demand.

Peterson Response to Your Response: Specific airline withdrawals from PFN and loss of major hub destinations have been documented. Specific airline "commitments" to withdraw have been

documented. Specific flight cancellations have been documented , at this time, from a year to several years. Some of the Sponsor's forecasts have been outrageous. Some are more reliable. The current down trend is specific? Which ones, specifically did the FAA use?

58

1-5-28 Much has been forecast in terms of Aircraft Boardings with more than optimistic pictures of exponential national and international growth in air travel. Number skyrocket in the out years; but the near term is ignored in The sponsors forecasts. Where will it come from? Which airlines are potential candidates? What size market will it take to achieve an introduction of one or more airlines whether it be a Legacy airline or a Walmart airline sometimes called a Low Cost Carrier (LCC)

59

Response See response to comment 5-5-27.

Peterson Response to Your Response: See my response to 5-5-27

Panama City - Bay County International Airport Environmental Impact Statement

Public Comments and Responses

Carl D. Peterson
1049 Individual Letter

1-5-29 Currently PFN has ASA, Northwest Airlinck and Chautauqua Airlines with ASA the predominant carrier with 142,582 enplanements to Atlanta as its destination. Next is Northwest Airlinck with 36,835 enplanements from here to Memphis. Comairs boardings dropped 54% to 2,846, Skywest is gone as is USAIR with 12,800 enplanements. Only Chautauqua remains with a one daily trip to Orlando. The names dropped from time to time are Southwest, AirTran and Jet Blue airlines. An examination of their operational status might reveal why they are unlikely candidates.

Response Aviation forecasts are prepared based on anticipated demand and is not airline specific unless specific airline commitments have been documented. The forecasts include a review of enplaned passengers and potential markets, and the size of potential aircrafts that would serve these markets. It is not within the scope of the EIS to predict airline responses to demand.

60

Peterson Response to Your Response: This is a recurring response to my statements. Maybe it would be easier on the concerned public if they knew what constitutes a specific airline commitment . When an airline announces they intend withdraw from a specified airport, what must it do to satisfy your criteria? What is the FAA's criteria for developing forecasts. What has your analysis revealed for PFN and when was it done? Is your analysis dynamic and continuous; or, done on a fixed calendar basis?

1-5-30 Southwest Airlines currently operates from 58 cities with 59 airports, Only six cities have less than 1,000,000 enplanements per year and five of the six are in their home state of Texas. It has recently acquired six gates at Chicago Midway from bankrupted ATA Airline and established a code sharing arrangement with ATA that will give them access to Reagan National, Le Guardia, San Francisco, St..Petersburg/Clearwater, Ft. Myers, Boston Logan, Minneapolis/St. Paul, Newark, Denver, and Sarasota/Bradenton. Finally, with this arrangement, Southwest becomes the first LCC to go international with access to Hawaii, thus taking a giant step toward being a full service airline. With such ambitions where would PFN fit in and when? Southwest flies B737s with an average seating capacity of 130 and with a 66.8% load factor. Where would we fit into the picture? Ask The Sponsor. AirTran Airways flies to 43 commercial airports with enplanements ranging from 250,410 to 39,411,618 enplanements [sic]. They pulled out of Tallahassee after nearly two years and a \$3.4million subsidy from the city and moved to Sarasota/Bradenton market of 767,000 enplanements and with subsidies from local government and the business community. Currently AirTran operates into Ft. Lauderdale, Ft. Myers, Jacksonville, Miami, Orlando, Pensacola, Sarasota, Tampa and West Palm Beach. They operate 77 B717- 200s and five B737-700s. Is PFN a viable market for an ambitious AirTran? Jet Blue Airways is a rising star in the LCC community that serves 29 commercial airports, four of which are in the Caribbean. Of the 25 US airports

served only one is less than 1,000,000 enplanements. Their total potential customer base is 184.96 million enplanements per year or, an average of 7.4 million enplanements per year. With 60 Airbus A320 aircraft configured with 156 seats they could haul our 2004 daily passenger enplanements in four aircraft

Response Aviation forecasts are prepared based on anticipated demand and is not airline specific unless specific airline commitments have been documented. The forecasts include a review of enplaned passengers and potential markets, and the size of potential aircrafts that would serve these markets. It is not within the scope of the EIS to predict airline responses to demand..

Peterson Response to Your Response: See my response at 1-5-29 261

1-5-31 The point is: How is The Sponsor going to attract a LCC to Panama City? There are four additional LCCs and seven regional air carriers that are potential candidates for PFN in addition to the above. Which segment of our market would be a target? Does The Sponsor have a marketing plan? Where is The Sponsor's solid justification that demonstrates a need for expansion beyond glittering generalities and emotional appeal? Where's the evidence that we can at least return to the 24 commercial airlines each day as was demonstrated in 2001? Until The Sponsor can prove unequivocally with hard evidence that the an aviation need exists for a new airport without fanciful undocumented forecasts, there is no need to move from the present location unless this is purely a land deal among the power brokers and there isn't any Commercial and GA aviation proven need.

Response See response to comment 1-5-30.

Peterson Response to Your Response: See my response at 1-5-29 262

Panama City - Bay County International Airport Environmental Impact Statement

Public Comments and Responses

Carl D. Peterson
1049 Individual Letter

1-2-32 There is no conflict in airspace use with Tyndall AFB. With appropriate air traffic control procedures and the cooperation of commercial and general aviation can be accommodated. Prior to 911, TAFB Approach Control Traffic Counts including over flights were: Military-44.2 %, General Aviation-31, 5%, and Air Carriers 24.3%. A problem did not exist at that time and with reduction of commercial airlines schedules for PFN the airspace is substantially changed. May 2001 was the peak month for Commercial airline traffic counts and the number has dropped since.

Response On September 10, 2002 Brigadier General Larry D New, Commander of the 325th Fighter Wing stated in a letter to Mr. Randy Curtis expressed this concern:

“Expanding the existing PFN facilities would present unique challenges and lead to greater conflict with Tyndall AFB operations, assuming expansion would attract more commercial aircraft and large frame aircraft”

The FAA has coordinated with USAF representatives throughout the EIS process. There have been no indications in meetings or written correspondence from Tyndall RAPCON of a radar coverage problem at the proposed site. As part of airport development further coordination and planning will be required. The FAA will ensure that the appropriate air navigation and air traffic control facilities will be provided for the efficient and safe operation of the airport.

Conceptual Class D airspace equal to in size to the Class D airspace currently serving PFN could be accommodated at the proposed new airport site (see Section 3.5.1.1) allowing the same amount of maneuvering airspace for the proposed new airport as at existing PFN. The proposed airport's Conceptual

Class D airspace has adequate lateral separation, approximately 3.0 nautical miles, from Restricted Area R-2914A and would not impact operations in Restricted Area R-2914A.

Peterson Response to Your Response: It is interesting to note that according to the 325th Fighter Wing Airspace Management Chief and the wings flying safety office the 325th experienced "One (1)" near miss in the entire year of 2005 and "One (1)" near miss in 2004. Both incidents involved VFR incursions into Special Use Air Space and did not involve an airline or other jet aircraft using coordinated routes and procedures that are "potential conflicts." I don't care what Gen New wrote the facts are over the last two years, at least, with the F22 operating at or near authorized squadron strength and other training going including a variety of military aircraft there has only been one near miss in 2005 involving aircraft from Tyndall AFB and PFN in 2005 whose combined landings and takeoffs number approximately 175,584.

To say that the miniscule operations from PFN is a threat to military operations is an outright insult to TYN's Approach Control personnel and capabilities. The replacement in the future of Tyndall's current radar with a digital radar that will access to radar data feed from similar radars in the area of various size and capabilities will further enhance TYN Approach Control capabilities.

How the FAA can support the Sponsors alleged clash of military and civil aircraft when they have a commercial airport with a bout 2600 operations per day with a peak hour of 245 operations per hour including a fifth new runway all within two miles of each other --- I'm referring to Atlanta. I don't know the actual separation in feet between runways but the average if evenly spaced would be 2100ft. Add in FTK, 10nm away (346ops/day), PDK 16nm away (639 ops /day) and MGE 17 nm away with of all things the F22 production and test flight facility and you have a "real" not an "alleged" complexity and a "potential for conflicts." With PFN averaging one(1) airline operation every 1.3hrs per 16 hr day confirms what I wrote Ms Catherine Lang, Acting Associate Administrator For Airports, FAA, Washington DC that one can conclude that the FAA is reckless at Atlanta or fleckless at PFN. Maybe both.

2-1-33 Here's another abbreviated version of how this airport came about. On 20 April 1998, The Business Editor of the Panama City News Herald wrote, "St. Joe was on the prowl again." With respect to transportation, he wrote, "We need better transportation, here, we need more four-lane access, --more rail lines, more airlines more everything." Then he said, "ST. Joe is standing at the nexus in the history of Florida development." This illustrated what was about to happen.

Response Comment noted.

Peterson Response to Your Response: Check Peterson Response to your Response at 3-1-1 for the St Joe Co influence on the PFN relocation project dating back to 19 November 1999

2-1-34 Great "Buzzwords but the substance is not contained herein to back up the growth, potential, prepare for future opportunities, expansion and projected demand.

Response Comment noted.

Peterson Response to your Response: Still great Buzzwords

1-3-35 Whose "airport staff management" identified the "key limiting factor" that makes the location relationship to Tyndall a hazard to commercial air carrier operations? What FAA authorized airspace study has identified this situation as a safety of flight hazard?

Response Randy Curtis indicated that the location of PFN in relation to Tyndall was the key limiting factor to enhanced approach capability to Runway 32. However, the FAA has not been asked to conduct an airspace study relative to approaches to Runway 32.

Peterson Response to Your Response: I assume it is not a safety factor or the Sponsor has reckless disregard for safety. Which is it? This situation has existed since PFN was put into operation and now it's a calamity, a flight safety crisis! C141, C130, B757, B727, B737, DC9, type aircraft have flown into/out of PFN for periods covering decades; but, now, after all these years the Sponsor considers it a crisis. I have flown into/out of PFN for over 30 years and have never been on a missed approach into PFN as result of thunderstorms, heavy rain showers, or fog conditions etc. In the 1980s I stopped short of the 1,000,000 mile club as a business traveler due to my wife's surgery; otherwise I figure I could have clocked 1,500,000 before retiring from the business world.

65

Panama City - Bay County International Airport Environmental Impact Statement

Public Comments and Response

Carl D. Peterson
1049 Individual Letter

1-3-36 The Sponsor has failed to clearly identify the various sub categories of Special Use Air Space (SUA) such as Military Operation Area (MOA), Restricted Area, Warning Area, Air Traffic Control Assigned Airspace (ATCAA), and Military Training Routes (MTR) both VFR and IFR, And Airspace Classifications such as Class A, B, C, D,F, G etc. descriptions is misleading and incomplete. Additional airspace requirements, I'm told is in over water areas.

The performance characteristics of the F-22 in the take-off, landing and instrument departure and approach phase of flight are no different than any other fighter. If the Chief of Staff United States Air Force, General John Jumper can come to Tyndall AFB on a Thursday and leave a week later with three solo rides in the aircraft at age 59, then it can't be all that difficult or unique.

Further Warning Area the USN uses are controlled by Eglin AFB. It's a matter of scheduling the airspace between using air forces. The author of the above doesn't know what he's talking about. The current Warning Areas have been used for decades. What the The Sponsor calls SUAs are MOAs, Warning Areas, and Restricted Air Space as cited above The Sponsor's words connote more stringent airspace security than is warranted. See Chapter 3, Compatibility with Airspace Configuration and Utilization, Par 3.3.1/3 pages 19-20-21-35 for additional detailed explanation.

Response Conceptual Class D airspace equal to in size to the Class D airspace currently serving PFN could be accommodated at the proposed new airport site (see Section 3.5.1.1) allowing the same amount of maneuvering airspace for the proposed new airport as at existing PFN. The proposed airport's Conceptual Class D airspace has adequate lateral separation, approximately 3.0 nautical miles, from Restricted Area R-2914A and would not impact operations in Restricted Area R-2914A. DOD employee Gene Wintersole stated in an April 2003 meeting the possibility of additional airspace requirements for F22 training.

Peterson Response to Your Response: First, Mr. Wintersole was assigned to the 325th Fighter Wing, now retired. He was FOUR commands removed from the Department of Defense and ONE step down the command chain of the 325th FW Headquarters. In essence he was FIVE commands down the line Since some of the overland restricted airspace and all the over water ranges are controlled by military authorities at Eglin AFB, they should be speaking for themselves; and not by an individual whose level of authority is misrepresented to those that read this report. The implication that PFN must move due to airspace problems is a myth

66

Having been the commander of the USAF Air Defense Weapons Center, Tyndall AFB from Feb 1973 until June 1977, I am well aware of the airspace associated with TYN flight operations both over land and over the Gulf of Mexico. The base complement of aircraft totaled 90+ jet fighters and trainer training aircraft. Further we had in those days joint training programs with the US Navy and Marine Corp fighter units (both active and reserve) as well as those assigned to TAC (ACC), USAFE, PACAF plus the Air National Guard and Canadian Air Forces. At times we had as high as

160 fighters on the base for air exercises, weapons meets dissimilar air combat training, air defense exercise, a 24/7 air defense alert commitment, our normal training missions, and last but not least operated the PQM 102 drone off the main runway. To say the place is now a hazard to general and or commercial aviation is totally and completely untrue; and, to move because of the F22 that has flown here for three years or more leads me to believe this is one crutch to justification that is without merit, in my opinion. Prove me wrong.

67

1-3-37 Here again The Sponsor. Once again, lumps all air space into one definition and ignores the unique characteristics of each category of airspace with different air space limitations. See Chapter 3, Alternatives, Par3.2.3 page 5, Page 3.2.3 page 6, 3.3.1.3 Pages 19-20-21-35 for additional detail explanations.

Response See response to comment 1-3-36.

Peterson Response to Your Response. See Peterson response to 1-3-36

68

1-3-38 Here again The Sponsor is implying something new and novel when in fact multi use airspace in the PFN area has been going on for decades. Specialized aircraft capable on supersonic airspeed have been operating from Tyndall AFB for five decades Having flown at airspeeds from 690mph at 100ft to 1500mph at 50,000ft, I'm stunned at The Sponsors newly discovered phenomena.

Response The FAA has coordinated with USAF representatives throughout the EIS process. There have been no indications in meetings or written correspondence from Tyndall RAPCON of a radar coverage problem at the proposed site. As part of airport development further coordination and planning will be required. The FAA will ensure that the appropriate air navigation and air traffic control facilities will be provided for the efficient and safe operation of the airport.

Peterson Response to Your Response. No one has the courage or guts to go out on a limb on this because of the politics associated with this proposal, the desire to be a "good neighbor" or don't want to get caught in a contest with a skunk. I have yet to find any comments in the meetings conducted by your contract representatives with Air Force personnel that indicates near misses, military aircraft "spill outs" from controlled airspace has caused near collisions with either general aviation aircraft or commercial airlines. Having been through an alleged threat to civil aviation via a Dan Rather 60 Minutes TV piece brought about by FAA controllers in Jacksonville in the 1970s accusing the Weapon Center of endangering commercial airlines by Spill Outs, I know the drill. Fortunately we video taped our flight operations at the time and when the USAF IG came down to check the allegation we showed the tapes for the dates we were accused of violating airspace and were vindicated. The accusations were so erroneous that we were accused of Spill Outs on days we didn't even fly. Had we not had the video recordings I would have been fired. Needless to say we were vindicated, CBS was briefed, shown the data and Dan Rather put the story on national TV anyway. Thirty years later he did it with President and got fired.

69

1-5-39 The Sponsor doesn't identify who the Air Force representatives were. It does not define "increasing numbers" It is a fact that PFN's commercial air traffic has dropped by 50% from May 2001 to January 2005, 24 aircraft to 12 aircraft per day and has lost two travel destinations in cuts to date. The B757, B737, B727, DC-9, USAF C-130s consistently use PFN and an occasional C141 has been known to use PFN. RJ's have been operating from PFN for quite some time, the configuration of which is the basic configuration or, usually, a stretched versions of an existing RJ. The word "potentially" is one of The Sponsor's favorites.

Panama City - Bay County International Airport Environmental Impact Statement

Public Comments and Responses

Carl D. Peterson
I049 Individual Letter

Response USAF officials are identified in the meeting sign in sheets in Appendix B. The forecasts of operations and enplanements include the projected increased number of operations and are included in Section 1.7.

Peterson Response to Your Response: Thank You. I reviewed the attendance rosters, one of which has unit affiliation, 25 September 2003 meeting. The 28 April 2003 roster was inadequate having only name, telephone number and e-mail address (hardly an accurate reflection of those attending). Of those attending the 25 September meeting, their organization falls under the 325th Operations Group who, in turn reports to the 325th Fighter Wing Commander which puts the attendees "pretty far down the pecking order" when it comes to decisions etc. They certainly do not represent DOD nor Hq, USAF, Air Education and Training Command and 19th Air Force all of which have command oversight from the top down. The Ricondo & Associate types were off base and reckless by referring to the Attendees as DOD representatives which is a huge stretch to those that understand the DOD organizational structure. It's sort of a Dan Rather story.

70

1-5-40 The airline operating the type aircraft cited above should be aware of the load bearing capacity of the airfield and limit fuel loads to that to accommodate the aforementioned type aircraft for most all destinations served by PFN. Does The Sponsor identify new destinations that would be served? With the cuts that have taken place this year in PFNs commercial air service, one would think The Sponsor would have a strategic plan aimed at a recovery equal to their 2001 destination schedule and travel options for the customer.

Response The forecast aircraft fleet and the identification of potential markets that could be served non-stop from the airport were developed on the basis of enplaned passengers, the number of annual passengers who are destined for specific markets based on historical ticket data, and industry trends in terms of fleet decisions and service patterns. The runway length requirements were based on those assessments and assumed that no passenger or cargo weight penalties would be required for those markets.

Peterson Response to Your Response: This paragraph is another flawed forecast with a wish list need. The comment "****there is a potential demand for narrow-body jet aircraft such as the Airbus Industries A320 and the Boeing 737-800 series aircraft in the future" is not documented with factual data to illustrate and confirm this need. This forecast has been overtaken by events. Since 2003 PFN has been reduced to 12 flights per day and lost two major destination hubs, Tampa and Dallas Fort Worth. No evidence is provided to validate such an increase in capability; and, in light of the downturn over the past two years in passenger hauled and the major passenger carriers being in the air taxi column and not the airline column, where does the Sponsor get off showing the A320 and B737 as aircraft in their future? The Sponsor would be happy to get back to 25 flights per day even with air taxi type aircraft let alone an A320 or a B737.

71

1-3-41 This is a myth and there is no evidence to prove it. See numerous comments on the F-22 and airspace control in this chapter and Chapter 3, Alternatives, par 3.3.1.3 pages 14-20-21-22-35 for additional comments.

Response See Appendix B for USAF consensus on effects of additional traffic at PFN on Tyndall mission

Peterson Response to Your Response: The Burkman Report is so much eye wash. Having flown in the Tyndall operating areas and the gulf ranges for four years and accumulated about 400 flying hours in just those areas, I find worries about the F22 to be a pipe dream. The one (1) F22 squadron has been operating out of Tyndall for over three years. If there has been an airspace crisis since its arrival the word would be out. Has the FAA had any formal requests for added airspace from the USAF because its performance characteristics are so unique that the 35th Fighter Wing's training mission has been jeopardized? If so, please provide me with a copy of such a request.

72

I have flown at Mach 1.8 to Mach 2 in the both the over water and overland airspace and performed low level training mission at 500kts in the training areas east of TYN and never had an airspace problem. I once had a "Canopy Unlock Light" at Mach 1.8. Talk about scare time. It didn't come

off. B/G Eggington's letter is far more to the point and he certainly doesn't insult one's intelligence with mythological descriptions of the F22s performance characteristics and general aviations and commercial airlines threat to its training missions.

73

4-3-42 The population growth of Bay County tapered off from the rapid growth rates of the 1970-1980 decades and dropped to around 16% for the 1990 decade. The projected growth from the 2000 census of 151,000 population of 20% would be about 181,00 [sic] population. A proposed 40% growth due to an airport relocation is not substantiated by a detailed analysis. The University of Florida's Bureau of Economic Business and Research (BEBR), should be the benchmark for population projections since they provide such data for the Florida governing bodies to perform analysis and budgeting for the State. A St. Joe/Arvida study was initially used by The Sponsor that showed exponential growth and was dismissed as an unreal projection. The Sponsor should use a recognized source of expertise such as BEBR instead of a consultant paid to come up with an answer to satisfy the customer.

Response The University of Florida's Bureau of Economic Business and Research (BEBR) was referred to as source for Table 4-6 and Table 5-18. The text has been revised to include the full name in the source.

Peterson response to Your Response; Thank you

1-2-43 Air Freight is divided in to two categories, Commercial Airlines and Other. Total airfreight in 2004 amounted to 1,715,972 lbs, down 26,03% [sic] from 2003. "Other" airfreight totaled 1,643,074 lbs of the total or 95% of the airfreight handled at PFN. The sponsor doesn't identify the storage requirements for commercial airline delivered freight from "Other" airfreight users. Security is not defined in relation to high value, time sensitive, secure documents, Federal Reserve transfers etc. The Sponsor should have completed a detailed analysis of the air freight market potential both by commercial air carrier and developed a marketing plan to substantiate growth and need.

Response An air freight analysis is not required for an analysis of the Airport Sponsor's proposed project

Peterson Response to Your Response: It is just as well. Air Freight isn't what it used to be with US mail deliveries down to zero and air freight predominately in the "other" category and not with the scheduled airlines

1-5-44 With Tallahassee and Pensacola forecast to be the 8th and [sic] 4th fastest growing airports in the US by 2010, it appears to me, that this statement should be backed up by statistical evidence or The Sponsors strategic marketing plan. As of now commercial flights are off 50% from 2001 and no public announcement has been made on how PFN decision makers plan to make a turnaround. Increases in conflicts should be backed up by historical evidence that identifies where and when such conflicts occurred and why. Also, for example, What "Potential Increases" are anticipated and where do they generate?

74

Response See Appendix B for USAF consensus on effects of additional traffic at PFN on Tyndall mission.

Peterson Response to Your Response: What has affects on Tyndall Mission got to do with competing with Tallahassee and Pensacola?

**Panama City - Bay County International
Airport Environmental Impact Statement
Public Comments and Responses**

Carl D. Peterson
1049 Individual Letter

2-1-45 If Federal specific needs are met with a 6800ft runway to 2018 why even consider an 8400ft runway in this DEIS when the data doesn't justify the need for such a runway length?

Response The 8,400' runway is analyzed in the FEIS because it is the Airport Sponsor's proposed project. The 6800 runway length is also analyzed in the FEIS.

Peterson Response to Your Response: OK Question; How much will the FAA fund toward this project if the specific need is for a 6800ft runway?

75

1-5-46 Okaloosa Regional Airport has just completed the construction of a new air terminal in December 2004 and is open for business. It's a USAF joint use agreement permits up to 84 operations/day and the Okaloosa Regional Airport Director can authorize charter flights, including foreign charter aircraft upon request. Like PFN, they will use only 52 operations/day with the withdrawal of USAIR from serving that airport compared to PFN's 24 operations /day. Their general aviation airport is located in Destin some five miles south of Eglin AFB and responds to both Eglin Approach Control and Control Tower. Okaloosa Regional Airport is authorized 84 operations per day and exceeds PFN's operations per day effective 9 January 2005 by a factor of 3.5. Further, Okaloosa is currently negotiating with AirTran and Gulfstream LCCs for entry into the their [sic] commercial passenger market. Where will that leave PFN if these carriers are added to the VPS schedule?

Response Aviation forecasts are prepared based on anticipated demand and is not airline specific unless specific airline commitments have been documented. The forecasts include a review of enplaned passengers and potential markets, and the size of potential aircrafts that would serve these markets. It is not within the scope of the EIS to predict airline responses to demand.

Peterson Response to Your Response: Same old tired buzzwords. I guess this is the reason that the Sponsor didn't answer the questions in your 18 August 2000 letter to Randy Curtis asking for comments on getting Southwest Airlines and would attract a larger share of traffic from outside the Southeast. Since these are anticipated demands by PFN, they didn't have to respond to your letter. Am I right?

76

1-3-47 There is no reason to believe that the two airport concept could not work for PFN should the USAF approve joint operations for PFN's commercial air carriers.

Response Please see the discussion of the Joint Use alternative in Sections 3.2.5 and 3.4.4 of the FEIS. The FAA has not received a response from the US Air Force on the October 7, 2003 letter (included in Appendix D).

77

Peterson Response to Your Letter: See my comment at Par 3-1-1

3-1-48 In an e-mail dated 15 September [sic] 2003, AF/XOO-CA, Mr. Tim Bennett the POC for Joint Use Agreements for the Air Force noted the following "Generally the Air Force is willing to consider joint use at an airfield if it does not have pilot training, nuclear weapons, or a primary mission that requires a high level of security." Bennett then writes: "We have interpreted "pilot training" to mean bases that have Undergraduate Pilot Training and not follow-on crew training. Again the key to this sentence is "generally" and "will consider."

The DEIs does not reflect that the PFN Airport Authority nor the FAA's DEIS contractor has/had negotiations on this issue of joint use at Tyndall AFB since neither has included as evidence correspondence to/from Hq. USAF that would indicate a request and denial to joint use of TAFB was even considered. Both The Sponsor and FAA have failed to document that the FAA process has been followed. This is an alternative that should have been examined to begin with instead of summarily dismissed based on a "read" of the directive. To me both The Sponsor and the FAA failed to use the checklist in the relocation process. It is an error of omission.

Response See correspondence to the USAF from the FAA regarding joint use in Appendix D. The October 7, 2003 letter from Virginia Lane to BG Larry D. New states, "Based on our review, it does not appear that joint-use with Tyndall AFB is an alternative that should be carried forward for detailed environmental analysis and this will be noted in the EIS analysis. If you would like to provide us with any additional input with regard to these issues please contact me." No additional information or response was received by the FAA.

Peterson Response to Your Response: See my Response at Par 3-1-

78

Panama City - Bay County International Airport Environmental Impact Statement

Public Comments and Responses

Carl D. Peterson
1049 Individual Letter

1-5-49 With only 12 flights/day, following USAIRs departure, the move to "The Sponsors" preferred relocation site is highly questionable. The current airport can and has accommodated aircraft up the size of a B757 such as the: DC-9, B-727, B-737, B757, C141 and C-130. The limitation to operating from PFN is the weight and displacement limitations described in the Airport Facility Directory based on wheel configuration (single, tandem, dual tandem). If the current airport can and has supported the aforementioned aircraft than it can support A320s and A319s and the B767 as long as the aircrew operates within the parameters established in the Airport Facility Directory and in accordance with the aircraft's operating instructions.

79

Response See response to comment 1-5-40 above.

Peterson Response to Your Response: See my response to 1-5-40

3-1-50 The West Bay Site is located further from Bay County's population center than any other commercial airport in Florida. Travel time will vary but during the early morning and evening hours traffic is exceedingly heavy. Has any agency calculated the travel times for medical response teams that could be required in a major commercial aircraft accident on landing or takeoff when casualty assistance is immediately needed from the two major hospitals located within the county?

80

Response Relocation sites were determined in accordance with NPIAS criteria, see Section 3.2. The FAA does take into consideration accessibility of the proposed project to emergency services in identifying alternatives.

Peterson Response to Your Response: What is the FAA's criteria for emergency service accessibility?

1-5-51 This is nothing more than forecasting a fantasy. Using the FAA's TAF there is no need to lengthen the runway based on FAA's forecast. The trends in commercial aircraft are for smaller configuration commercial aircraft to meet the type and size of passenger service for which this area is noted. The Sponsor has yet to provide solid justification for relocation as opposed to community economic development. The Airport Sponsor has already held up needed maintenance facilities request by a tenant FBO because of the uncertainties associated with the airport relocation and amortization of the FBOs investment at the current facility and investment costs at the relocated facility. General Aviation which constitutes the major portion of PFNs operations is given little concern, no guarantees, and, apparently has to take all the financial risks in order to obtain access to the new airport

Response The FAA independently reviewed and assessed the runway length requirements and determined that 6,800 feet would accommodate the anticipated fleet mix for the potential markets that could be served non-stop from the airport Comment noted for the comment on general aviation.

81

Peterson Response to Your Response: Does this mean, if the Sponsor wants an 8400 ft runway, that the FDOT and the Sponsor will have to fund the other 1600ft of runway elsewhere?

1-5-52 What makes anyone think that The Sponsor whose [sic] done little or nothing at all for GA owners and operators will get any expansion at all? More than likely will be a drop off in business as they were advised of such by small aviation related operators whose businesses will evaporate at a recent Airport Authority public hearing.

Response Comment noted.

Peterson Response to Your Response: GA is an unwanted child at the table until it comes to paying the bill.

Panama City - Bay County International Airport Environmental Impact Statement

Public Comments and Responses

Carl D. Peterson
1049 Individual Letter

I-3-53 There has been no satisfactory explanation given as to why the performance characteristics of the F-22 in an approach/departure, takeoff, landing or instrument approach control environment is so unique, for example from the F-15, F-16, F14, F-18, F106, F-4 or F-101 that requires a move of PFN to "de-conflict" commercial aircraft from the F-22 because of its high performance characteristics. What airspace criterion and who established it is The Sponsor referring to? This lack of defining the criteria is an omission that needs to be answered and explained to justify a PFN relocation based on the USAF mission at Tyndall AFB. Why does the FAA accept such a statement when other AF bases, joint use or close to high density commercial aircraft operations, that have or will have F-22s do not seem to have a "de-confliction" problem; or, if they do, have adapted to the operating environment they find themselves in?

Response DOD representative Gene Wintersole stated in an April 2003 meeting the possibility of additional airspace requirements for F22 training The airspace criterion as described in Section 3.3.1.1c was developed following consultation and coordination with DOD representatives. The various elements of the criterion address the specific concerns raised by DOD during those meetings.

Peterson Response to Your Response. Gene Wintersole was a member of the 35th Fighter Wing's Operation Support Squadron and IS NOT a DOD representative. This is a gross misrepresentation of his level of decision making authority. Your EIS contractor/ consultant has significantly overstated his level of responsibility. Major General Eggington in his 25 January 2005 letter to Ms Lane noted "fulfilling the mission requires either the maintenance of the current airspace configuration (SUAs, ATCAAs, and approach/ departure corridors) or the design of any new airport and associated approach and departure corridors do not interfere with Tyndall's SUAs, ATCAAs. Approach and departures"

No where in his letter did he ask for new airspace, bring up an F22 need for airspace beyond which exists as described in his letter. In essence, being Wintersole's boss his need describes the mission needs of the Air Force not, now retired, Mr. Gene Wintersole.

I-3-54 PFN has had to contend with SUAs and MOAs almost since its inception at its current location. The thesis that an airport relocation is needed after 40/50 years of operation in its current location because of transiting military traffic is needs to be proven as an unquestionable statement of fact. The Sponsor should document the comments regarding "non-participating aircraft are either restricted or prohibited" in performing their flight. The mission of the 325th Fighter Wing is diminished from the missions performed by former Major Air Commands at Tyndall AFB when over 90 to 100 jet fighters and trainers were assigned; and, deployed fighter ran the total to 125 aircraft ignores the fact that current operations are far less than in the past while the SUAs and MOA's are virtually unchanged Further, The Sponsor's definition of SUA s doesn't hold water. • On the *US Sectional Aeronautical Chart*, there is a clear delineation of a Restricted Area, Special Airport Traffic Airspace and Military Operating Area with definitive guidance for each.

• The *US Jet Navigational Chart* adds a Special Use Airspace (SUA) with the definition Alert, Danger, Prohibited Restricted, or Warning Area.

• The *IFR Enroute High Altitude U.S. Chart* defines Special Use Airspace (SUA) as Prohibited, Restricted, and Warning Areas. MOAs are not shown on this chart for Tyndall nor Pensacola but does show Restricted Areas for Eglin and Warning Areas over the Gulf of Mexico for all. These different definitions apply to

varying operational and type of flight missions both military and civil and one size doesn't fit all. CHART H-8 displays only the four Restricted Areas around Eglin and four small Restricted Areas in Central and South Florida.

• The Sponsor should be required to more clearly define the criteria consistent with the air charts used by pilots in commercial, general and military aviation aircraft. This is a distinct difference from The sponsors use of these terms in order to support their justification for the relocation of current airport.

Response The definition of Special Use Airspace (SUA) represents the various types of defined airspace that have varying types of restrictions for use, depending on the specific type of SUA. The overall definition of SUA was provided for simplification to the reader. All assessments were prepared based on the stated restrictions or limitations within the various SUAs as defined and as provided on aeronautical charts. Comment noted regarding operations within special use airspace.

Peterson Response to Your Response: Major General Egginton's letter spells out the Air Force need for airspace to support 325th Fighter wing Mission/] 83

Panama City - Bay County International Airport Environmental Impact Statement

Public Comments and Responses

Carl D. Peterson
1049 Individual Letter

5-5-55 Further, the letter from the 325th Fighter Wing Commander B/G Larry New is in no way an USAF endorsement. In an e-mail to me on 19 August 2003 he stated: "You're right, this letter doesn't equate to Department of the Air Force endorsement." At that time it the Partners in Progress was running a advertising campaign promoting the PFN airport relocation and their web site carried his letter as a Department of the Air Force endorsement. He had the endorsement withdrawn. Just because the Letterhead shows Department of the Air Force at the top of the stationary doesn't constitute an endorsement. This DEIS study should reflect the above and avoid erroneous implications.

Response The FAA did not seek nor consider the letter to be an endorsement from the USAF. The FAA has included this e purposes. The FAA provided LTC Colonel Seamans a copy of the referenced letter prior to the September 25, 2003 meeting for EIS coordination. LTC Seamans did not indicate that the letter had been withdrawn.

Peterson Response to Your Response: I strongly recommend that the FAA recognize the letter from Major General Egginton , 5 January 2005 that it be recognized as the Letter of Authority from the USAF] 84

1-3-56 Is Tyndall's airspace criteria more critical or stringent than that of Eglin AFB, Nellis AFB and Langley AFB, all three of which have or will have the F-22? If so, why?

Response Conceptual Class D airspace equal to in size to the Class D airspace currently serving PFN could be accommodated at the proposed new airport site (see Section 3.5.1.1) allowing the same amount of maneuvering airspace for the proposed new airport as at existing PFN. The proposed airport's Conceptual Class D airspace has adequate lateral separation, approximately 3.0 nautical miles, from Restricted Area R-2914A and would not impact operations in Restricted Area R-2914A.

1-3-57 Their has been no recent public announcement of the USNs transfer of the US Navy's Weapons Range to Tyndall AFB with a date and size organization. Would they not use the ranges controlled by an Eglin AFB unit assigned the responsibility for range control, both air/air and air/ground training missions? What size and frequency will the USN mission have in terms of operations, breakout between air/air and air/ground? The most recent exercise was launched from a carrier in the Gulf of Mexico and not from a land based military airfield.

Response USAF James Roncaglione stated in an April 2003 meeting the possibility of the accommodation of USN activity from Puerto Rico.

Peterson Response to Your Response. Jim Roncaglione told me this week (June 19-23 2006) that the US Navy's exercises in this area are using their aircraft carrier for its base of operation. Besides, in the 1970's we had Navy and Marine Corp fighter forces operating out of Tyndall AFB on a continuing basis. Someone is trying to reinvent the wheel with a congestion fear factor.

85

1-3-58 Destin Fort Walton Airport is located within an Eglin AFB E MOA and is controlled by Eglin Approach Control and Eglin Tower. This does not seem to have hindered F-22 or F15 operations from Eglin or the combat crew training, flight and/or armament test missions from being accomplished due to their proximity to Eglin AFB. Also two SOF airfields are located within two Eglin restricted airspace zones, R2915A and R2914A. It has been reported that Okaloosa County wishes to increase the ramp space at the Destin airfield. If so, it counters the statement above concerning [sic] its development.

Response The concerns of the USAF and other branches of the military have been documented throughout the EIS process, and meeting summaries are included in Appendix B. The fact that a current situation exists in no way indicates that it is a desirable or efficient condition.

86

Peterson Response to Your Response: I would recommend that the FAA get a letter from the senior commander at Eglin AFB for the record. I didn't see one in Appendix II or III.

Panama City - Bay County International Airport Environmental Impact Statement

Public Comments and Responses

Carl D. Peterson
1049 Individual Letter

3-3-59 Use of Other Airports, for comments and quotations from AF/XOO-CA of 15 September 2003 for clarification of the USAF position on "Training" which indicated that the USAF "Generally and "will consider" a request for joint use. Apparently no request was submitted for consideration or a denial would have been included in the DEIS for evidence. The PFN and FAA study contractors must have assumed that the final word was in the directive. Not so, The USAF has 13 joint use bases and the oldest joint use agreement has been in effect for nearly 50 years and it's an AETC base. The failure to approach the USAF regarding joint use of Tyndall AFB as cited in previous comments shows the lack of thoroughness by The Sponsor. Discussed previously, The sponsor has not approached Hq. USAF and formally ask [sic] for permission from the AF to become a joint user of Tyndall AFB.

Response See correspondence to the USAF from the FAA regarding joint use in Appendix D.

Response to Your Response: Assuming you're referring to Ms. Lanes letter of 7 October 2003, she made an assumption that was wrong on page one and then advised the addressee B/G Larry New that Tyndall AFB was not being considered for joint use. See my comments on this issue in this document.

87

3-3-60 The Sponsors use of airspace as a justification for relocation in the manner used above is not consistent with the use of airspace definitions as defined for the users of air space, civil and military pilots, and not stretched into a crisis in for all and a threat to air travel. The MOAs have been there for decades; and, having spent about 550 flying hours in the Tyndall MOAs and 50 hours in the Eglin Restricted Areas in five different combat aircraft without an accident or incident due to airspace violations. With over five years as commander of the USAF Air Defense Weapons Center, Tyndall AFB, We didn't have any near misses, collisions or serious incidents due to MOAs and misuse of airspace, accidental or otherwise.

Response Airspace criteria were developed on the basis of FAA coordination with USAF.

Peterson Response to Your Response: Thank You

3-3-61 As noted before, the USN use of the over water ranges or air to ground ranges will be controlled from Eglin AFB by their range control agency. The F-22 is, once again, not an operational problem and words such as "could," "may," unsubstantiated increase in PFN traffic levels, and "an expansion of certain SUA areas" by type or location is misleading and are emotional arguments used by The Sponsor to secure a move.

Response The concerns regarding the F-22 were raised by the USAF, the operator of the aircraft, and not by the Airport Sponsor or the FAA.

Peterson Response to Your Response: The 35th Fighter Wing Commander has scotched that concern with his letter 5 January 2005 letter concerning airspace needs. The low level expression of concern for the F22 has been shown to be invalid after three years of operational use.

2-5-62 No mention is made by The Sponsor of extending Runway 14-32 into the bay using the La Guardia Airport approach for a runway extension by installing a runway pier as opposed to using fill dirt. While it may cause a loss of sea grass beds, it will not disrupt the flushing effects caused by tidal changes. A 6800ft runway using this concept would be less expensive than relocating PFN with a 6800ft runway in West Bay by several orders of magnitude.

Response As indicated in the FEIS, it was determined that any impacts to seagrasses and sovereign submerged land would be eliminated from further consideration based on discussions with the FDEP, NMFS, and the USACE and written correspondence from FDEP received in October 2003 and February 2004. These letters are included in Appendix D.

Peterson Response to Your Response: You better go back to the FDEP since you've included in the FEIS the Sponsor's resale option(s) that could end up virtually assuring the destruction of Saint Andrew Bay. What is at risk is 350 plant species, 1782 invertebrate species, and 398 vertebrate species for a total 2520 species in an area of just 1144 sq. miles. By moving the airport to the West Bay and allowing the Sponsor, as an option, to advertise the existing property for sale with a concept that includes a 250 boat marina, a golf course, condominiums and retail stores, the FAA has opened up Goose and Robinson Bayou to pollution levels that, in perpetuity, will contaminate the immediate areas adjacent to the existing airport and in turn the bay. Add in the impact on West Bay across the bay and you have two pollution sources far worse than extending the existing runway to 6800ft that will destroy much if not all of the biodiversity of St. Andrew Bay. I'm not an environmental expert but it seems to me a Supplemental Environmental Impact Statement (SEIS) is required on the resale option.

-5-63 The above list of preparers are a distinguished group; however, there is a total lack of expertise in airport planning, commercial and general aviation aircraft operations. Also lacking are preparers with expertise in the aircraft command and control field, such as air traffic control, airspace management, military operations and use of military warning areas, restricted airspace, and other special use airspace. Further, it is evident that the operational capabilities of commercial, general aviation, and military aircraft are lacking. If The Sponsor has provided the inputs for the above features of the DEIS than they should be so identified along with their biographical sketch in order for the public whose involvement in this most expensive project can be assured that the best and most knowledgeable people have assembled this DEIS and the facts to support it. . As is, it leaves much to be desired.

Response Chapter 7 has been revised to clarify FAA and consultant team qualifications. The FAA prepared the EIS, not the Airport Sponsor.

Peterson Response to Your Response: Thank You